

OAR-17-000-4457
P142

B BREITBURN

BREITBURN OPERATING LP
707 Wilshire Boulevard, 46th Floor
Los Angeles, California 90017
/ 213.225.5900 / 213.225.5916

RECEIVED ^{January 17, 2017} JAN 19 2017

Via Email (Tsirigotis.peter@Epa.gov)
and Courier

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension of Deadline to Respond to Information Collection
Request of U.S. Environmental Protection Agency concerning Emission
Standards for Oil and Gas Facilities (ICR)

Dear Mr. Tsirigotis,

Reference is made to the 16 ICR letters that have been received by our various offices during the month of December, the latest of which was received on December 15, 2016. For the reasons set forth herein, we respectfully request the following: (i) that Breitburn Operating LP (Breitburn Operating) be assigned one individual Operator ICR ID for its various operations and facilities; (ii) that Breitburn Operating be granted a 90-day extension for responding to Part 1 of the ICR for all its applicable operations (i.e., through May 15, 2017); and (iii) that Breitburn Operating be granted a 90-day extension for responding to Part 2 of the ICR for all its applicable facilities (i.e., through September 11, 2017).

Background

Breitburn Operating LP (Breitburn Operating) is a wholly owned subsidiary of Breitburn Energy Partners LP (Breitburn MLP). Breitburn MLP became a publicly traded master limited partnership in October 2006, and Breitburn Operating is the primary operating company for all of Breitburn MLP's assets. In November 2014, Breitburn MLP completed a merger whereby it acquired QR Energy, LP.

Breitburn MLP's producing and non-producing crude oil and natural gas reserves are located in Ark-La-Tex; the Midwest; the Permian Basin; the Mid-Continent; the Rockies; the Southeast; and California. In May 2016, Breitburn MLP, and certain of its wholly owned subsidiaries including Breitburn Operating, (b) (4)

(b) (4) Since then, Breitburn Operating has continued operating all of Breitburn MLP's producing and non-producing crude oil and natural gas reserves.

The Assignment of Numerous IDs to Similar/Same and Non-Breitburn Entities Results in Duplicative Data Gathering Leading to Redundant and Confusing Data Compilation in the Future

As mentioned above, 16 ICR letters have been mailed to and received in various Breitburn offices throughout the country. A list of the letters is attached hereto as Attachment 1.

As reflected on Attachment 1, 16 different "Facility ICR ID" numbers with 16 unique invitation codes have been assigned to various Breitburn MLP entities. Based on the "Instructions for the Oil and Gas Information Collection Request," operators with more than 50 field operator sites should contact U.S. EPA "to get additional Facility ID assignments" but at this point, with 16 different letters, Breitburn Operating is unable to do so until it is assigned a "unique Operator ICR ID."

In addition, while several of the companies listed in Attachment 1 appear to be variations of the same (e.g., Breitburn Operating, LP and Breitburn Operating Limited Partnership) and another company (e.g., Breitburn Management Company) is a different but still wholly owned affiliate of Breitburn MLP, each of the foregoing has been assigned a separate ID.

Finally, several of the letters are addressed to entities that are not subsidiaries of Breitburn MLP, nor have they ever been subsidiaries of Breitburn MLP. The names of those entities are set forth below:

Quantum Resources Management LLC
Quantum Resources Management, LLC
Breitburn Energy Company LLC
Breitburn Energy Co LP

Presumably, the two Quantum-named entities are affiliated with the former QR Energy, LP but neither of those entities was included in the Breitburn – QR Energy merger which was completed in November 2014. The two Breitburn-named entities are predecessor name(s) for a company we believe is currently named Pacific Coast Energy Company LP – Pacific Coast is not a subsidiary of Breitburn MLP or Breitburn Operating.

In light of the foregoing, Breitburn Operating respectfully requests that it be assigned one individual Operator ICR ID for its various facilities so that it may successfully use the U.S. EPA's proposed incremental sequencing system applicable to instances involving more than 50 field operator sites. Doing so will avoid duplication of effort in compiling the data and future duplication (and thereby confusion) in the tabulation of the data ultimately submitted by Breitburn Operating.

Breitburn Operating Does Not Have Sufficient Personnel to Responsibly Comply with the ICR Without an Extension

As of December 31, 2015, Breitburn MLP had more than (b) (4) net) oil and gas production wells in seven different operating areas across 14 different states. In addition, Breitburn MLP had more than (b) (4) (gross) leasehold acres of developed and undeveloped acreage.

Breitburn MLP, like much of the oil and gas industry, has been significantly and adversely affected as a result of the prolonged downturn in crude oil prices that has been ongoing since at least November 2014 (if not earlier). As a result of the downturn, Breitburn MLP has, among other things, reduced personnel on more than one occasion. Since the end of 2014, Breitburn MLP has lost (b) (4) of its work force and ended 2016 with approximately (b) employees. Despite such reductions (and many other efforts), Breitburn MLP, and certain of its subsidiaries, ultimately filed for protection under Chapter 11 of the U.S. Bankruptcy Code in May 2016.

Notwithstanding its reduced staff, Breitburn Operating's EHS team faces – and continues to meet – a myriad of daily, weekly, monthly, quarterly and annual reporting obligations at the federal, state and local levels. These obligations have increased significantly in recent years. The most onerous reporting obligations occur during the first quarter – the exact same time frame currently contemplated for complying with the EPA's recent ICR. By way of example, set forth below are select lists (but certainly not exhaustive lists) of reporting obligations handled by Breitburn Operating's EHS team – the same team responsible for responding to EPA's ICR.

Annual Reports Due During First Quarter

- EPA Greenhouse Gas Inventory Calculation and Reporting
- California Air Resources Board Annual Greenhouse Gas Mandatory Inventory Reporting
- Air Emission Calculation and Reporting
- Annual Certification of Title V Air Permits
- DOT/PHMSA Natural Gas Transmission and Gathering Systems Reports
- DOT/PHMSA Liquids Transmission and Gathering Systems Reports
- Water Use Reports
- SARA Title III, Tier II Emergency and Hazardous Chemical Reports
- California Hazardous Material Business Emergency Plan Certification and Chemical Inventory
- California Board of Equalization Hazardous Waste Generator and Environmental Fee
- UIC Injection Well Reports

Select Additional Routine (i.e., Monthly/Quarterly) Reporting Obligations

- Emission testing and reporting
- Subpart KKK monitoring and reporting
- Subparts OOOO, HH, and ZZZZ monitoring and reporting
- Develop Subpart OOOOa fugitive emissions monitoring plan
- Monthly Sundry Reports (Pursuant to BLM New Rule: Waste Prevention, Production Subject to Royalties and Resource Conservation)
- Quarterly air permit reporting
- Groundwater monitoring reports
- SPCC inspections and plan review
- UIC injection well volume/pressure reports
- Monthly NPDES reporting
- Secondary containment monitoring reports
- Title V Semi-annual Reports
- LDAR reports for all components, wells & water handling equipment; NOX emission reports and certifications; stationary engine reports; and Industrial Waste Discharge Self-Monitoring and Benzene Reports (California)

In light of the foregoing, the only responsible way for Breitburn Operating to complete Part 1 and Part 2 of the ICR in accordance with EPA's proposed deadlines would be to incur significant additional costs and hire third-parties to assist in the effort. Unfortunately, and based on past experience, asking advisors unfamiliar with our operations to complete a task in a compressed time period rarely produces good or even adequate results and generally has not proven to be the most efficient path forward. In addition, the incurrence of such costs would be subject to scrutiny as a result of the ongoing Chapter 11 restructuring process.

Part 2 of the ICR Warrants An Extension Due to Similar Clarification Issues and A Limited Number of Independent Testing Alternatives

As outlined above, we have received 16 ICR letters leading to significant amounts of duplication and/or confusion. In addition, Part 2 of the letters are vague as they relate to various facilities. Not only do the corporate entity issues outlined above need to be resolved, Breitburn Operating requires additional facility information such as site location, mailing address, and/or other identifiers such as air permit numbers to identify and categorize potentially responsive facilities before it can begin addressing Part 2 of the ICR.

Some of the Part 2 requirements may also be impossible to complete in the time frame initially proposed by EPA. For example, Item 4 of the Detailed Facility Survey form covers "Tanks and Separators" and requires operators to provide pressurized liquid samples pursuant to GPA Method 2103 for thousands of well/tank facilities. Since there are a limited number of independent laboratories in the country that can perform such tests, operators being asked to complete Part 2 are potentially facing an insurmountable bottleneck once they, including

Breitburn Operating, overwhelm the qualified labs with similar requests to perform Part 2 testing requirements.

Conclusion

Breitburn Operating stands ready, willing and able to comply with the EPA's ICR. However, in light of the issues set forth herein, it would be unreasonable (and unrealistic) for existing Breitburn Operating personnel to collect and report responsibly the data requested for both Part 1 and Part 2 in the initial 60-day and 180-day periods, respectively, proposed by the EPA. For the reasons set forth herein, we respectfully request that: (i) Breitburn Operating be granted a 90-day extension through May 15, 2017, for responding to Part 1 of the ICR for all its applicable operations, and (ii) that Breitburn Operating be granted a 90-day extension through September 11, 2017 for responding to Part 2 of the ICR for all its applicable facilities. In addition to the foregoing, we respectfully request that EPA work with Breitburn Operating to assign one individual Operator ICR ID for its various facilities.

Thank you in advance for your prompt and positive response to our request. Please do not hesitate to contact the undersigned at (b) (6) if you have any questions concerning any of the matters set forth in this letter.

Very truly yours,

(b) (6)

(b) (6)

Vice President, Government Affairs

cc:

U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
Attn: Ms. Brenda Shine (shine.brenda@epa.gov)

Attachment 1
to
Breitburn Operating LP Letter dated January , 2017

Company Name	Assigned ID#	Invitation	Letter Number	Addressee
Breitburn Energy Partners LP	1084550	953H-8TIL	7237	(b) (6)
Breitburn Energy Partners LP	1084600	BEFI-VWFK	5037	
Breitburn Energy Partners LP	5001250	WGCH-V7XP	7247	
Breitburn Energy Partners LP	2102000	S5DI-FCWI	7245	
Breitburn Operating Limited Partnership	1084650	6200-LDX7	5184	
Quantum Resources Management, LLC	1532000	SBXM-1LNF	9578	
Breitburn Energy Company LLC	1084450	S8DU-CW5R	9475	
Breitburn Energy Company LLC	1084400	ESTK-VAYH	9474	
Breitburn Energy Co LP	2099000	AZZO-4ML1	9622	
Breitburn Management Company	2101000	G5UZ-RNZ7	5186	
Breitburn Energy Partners LP	3001180	TVDJ-W3EO	5834	
Breitburn Energy Partners LP	2100000	PQJI-NB2P	5833	
Quantum Resources Management LLC	2640000	QCHC-RPOK	9652	
Quantum Resources Management LLC	3007000	ZYX8-D5EO	533	
Breitburn Operating, LP	2103000	GPXC-ZJLE	10134	
Breitburn Operating, LP	2103000	GPXC-ZJLE	409	

0Arl-17-000-4264

P1+2

Lisa Thompson
called 1/5

K.P. KAUFFMAN COMPANY, INC.

WORLD TRADE CENTER
1675 BROADWAY, 28TH FLOOR
DENVER, COLORADO 80202-4628
TELEPHONE (303) 825-4822
FACSIMILE (303) 825-4825
www.kpk.com



RECEIVED JAN 5 / 2017

December 22, 2016

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander, Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
shine.brenda@epa.gov

Re: Petition for Extension of Submittal Deadline for EPA's Part 1 and Part 2 Information Collection Request

Dear Ms. Shine:

K.P. Kauffman Company, Inc. (KPK) requests a 60-day extension to complete Part 1 of the Information Collection Request (ICR), received by KPK on December 8, 2016. If EPA approves this extension, KPK will submit its response to Part 1 of the ICR on April 7, 2017. KPK also requests a 90-day extension to reply to Part 2 of the ICR; if EPA approves this extension, KPK will submit its response on September 4, 2016.

As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide the sought-after information. KPK operates over (b) (4) wells and approximately (b) (4) tank batteries. The Part 1 survey requires that we provide data for each well and its corresponding tank battery. The level of effort that will be necessary to respond to the ICR will be extensive and will require a significant amount of time to complete. In addition, the timing of receipt of the ICR has fallen right at the beginning of the holiday season, a time when KPK encourages its employees to spend time with their families. As such, KPK's relevant personnel will not have the opportunity to start this process until well into January 2017.

Additionally, KPK will be required to work with a contractor/laboratory to conduct the pressurized sampling required by Part 2. The level of detail requested is immense and due to the fact that we will need to visit the Part 2 facility and coordinate a contractor/laboratory to sample and analyze oil and water samples, additional time is warranted. Additionally, we will be required to conduct a significant level of internal and legal review to identify any Confidential Business Information included in the responsive data and information and to support such claims

December 22, 2016

Page 2

accordingly. We will also be working on a number of other federal and state annual reporting tasks at the same time, including, for example, EPA's Tier II reporting, Colorado's Regulation No. 7 reporting under Section XII (monthly control downtime reports and semi-annual submittal) and Section XVII (STEM/LDAR Inspections and annual LDAR report), and Colorado's Regulation No. 3, Part A APEN Updates. Please note that this is all in addition to the Third Supplemental Clean Air Act § 114 Request for Information KPK is currently working through, which must be submitted to EPA by the end of January.

The law supports providing the 60-day and 90-day extensions of the deadline for responding to Parts 1 and 2, respectively. The Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case—§ 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator may reasonably require”—requires EPA to set reasonable deadlines.

Notably, EPA is under no legally enforceable deadline to promulgate the § 111(d) regulation for which this information is ostensibly being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 60-day and 90-day extension will not prevent EPA from meeting any legal obligations, will not unreasonably delay issuance of the rule, and will allow KPK to collect all the requested information in the time allowed.

KPK appreciates your consideration of its petition for extension to respond to Part 1 and Part 2 of the ICR. Please feel free to contact me if you have any questions or need more information at (303) 825-4822.

Sincerely,

KP KAUFFMAN COMPANY, INC.

(b) (6)

(b) (6)

Vice President of Engineering

K.P. Kauffman Company, Inc.
World Trade Center
1675 Broadway, 28th Floor
Denver, Co 80202-4628



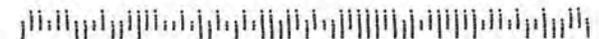
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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T. W. Alexander, Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

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OAR-17-000-4266

P112

Cordele Development Corporation

314 E. Commerce Street, Suite #400
San Antonio, Texas 78205
Phone (210) 223-5564
Fax (210) 223-9050

Lisa Thompson
called 1/5

December 20, 2016

Certified Mail: #7014 0510 0001 4258 9955

RECEIVED JAN 5 / 2017

United States Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, NC 27709

Re: Primary Facility ID #1148500

Dear Ms. Shine,

We are in receipt of your certified letter dated November 14, 2016, which we received on December 9, 2016, concerning climate change from the Obama Administration.

We are requesting an extension of an **additional 180 days** to complete both Part 1 and **Part 2** of the paperwork because we believe that we may be exempt.

Very truly yours,

(b) (6)

(b) (6)

Cordele Development Corporation

KG/stw

Cordele Development Corporation
314 E. Commerce Street, Suite #400
San Antonio, Texas 78205

CERTIFIED MAIL™



7014 0510 0001 4258 9955

U. S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Dr.
Mail Code: E143-01
Research Triangle Park, NC 27709



27709-031099



OAR 17-000-4272

PKJ



Lisa Thompson
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December 21, 2016

RECEIVED JAN 5 / 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: ICR - Request for Extension

Facility ID 1006200 ABARTA Oil & Gas, Inc

Facility ID 2002000 ABARTA Inc

Facility ID 3000030 Ken Fleeman, ABARTA Oil & Gas Company

Dear Mr. Tsirigotis,

ABARTA Oil & Gas Co., Inc. respectfully requests a 60 day extension of the submittal deadline for the above referenced facility IDs for both Part 1 and Part 2. Despite preliminary inventory preparation, the scope and timing present a significant burden on (b) (4)

Our current regulatory workload includes the annual GHG report and annual UIC injection report to the EPA, annual air emission inventory and well mechanical integrity report in Pennsylvania, Sarah Title 3, Tier II hazardous chemical inventory, annual DOT pipeline report, year-end production and waste reporting due in three states and an air permit renewal for a facility in Kentucky.

Other year-end responsibilities include natural gas and oil reserve report preparation for over (b) (4) wells in which we own an interest. We also have internal obligations to the fiscal close and external financial audit. ABARTA's entire staff is saturated having been reduced by (b) (4) due to poor natural gas and crude oil pricing. ABARTA will make its best effort to comply, however an extension would be greatly appreciated.

Regards,

(b) (6)

(b) (6)

Manager of Engineering

KEN/tgm

Cc: Ms. Brenda Shine

ABARTA
OIL & GAS COMPANY

200 Alpha Drive
Pittsburgh, PA 15238-2906

CERTIFIED MAIL



7015 3010 0001 7297 7512

///PITTSBURGH//Z

PA 150
21 DEC '16
PM 2 L



Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

[Redacted] 12/26 [Postnet barcode]



OAR-17-0004273

PLA

Lisa Thompson
left vm 1/5

National Fuel Corporation

P.O. Box 4892

Parker, CO 80134

(303) 220-7772 Phone (303) 220-7773 Fax

December 19, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

We recently received an Information Collection Request (ICR), EPA ICR No. 2548.01. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. Our operations are especially remote and subject to harsh winter conditions that would put our staff at personal safety risk. Therefore, in order to provide EPA with the most accurate possible information, we respectfully request **a 120-day extension for both Parts I and II.** This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 180 days to respond to Part I and 300 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

National Fuel Corporation

(b) (6)

✓ cc: Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

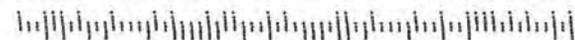
NATIONAL FUEL CORPORATION
P.O. BOX 4892
PARKER, CO 80134

DENVER
CO 802
20 DEC 15
PM 7:00



Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, MC: E143-01
Research Triangle Park, NC 27709

27709-031099





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P1+2

Christopher Boehler
Director of Regulatory Affairs

Lisa Thompson
left vm 1/5

December 13, 2016

RECEIVED JAN 5 / 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

Concho Resources Inc. ("Concho") recently received an Information Collection Request (ICR), EPA ICR No. 2548.01. This request is extraordinary, both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, Concho respectfully requests a **sixty (60) day extension for both Parts I and II**. This extension is absolutely necessary for Concho to conduct the detailed reviews necessary to provide information on the requested facilities.

We expect the anticipated burden of the ICR to be significantly greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing one hundred twenty (120) days to respond to Part I and two hundred forty (240) days to respond to Part II, EPA will be giving Concho much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

CB/kk



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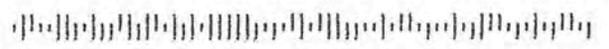


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RTPNC
Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

DEC 19 2016



OAR 17-000-4277

Left vm 1/15
- Lisa Thompson

P1 & 2



Whiting Petroleum Corporation
and its wholly owned subsidiary
Whiting Oil and Gas Corporation

1700 Broadway, Suite 2300, Denver, CO 80290-2300
Phone: 303.837.1661 | FAX: 303.861.4023

December 22, 2016

Via FedEx 7780 2566 3230

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Re: Information Collection Effort for Oil and Gas Facilities
Request for Deadline Extension
Whiting Petroleum Corporation

Dear Ms. Shine:

Whiting Petroleum Corporation (Whiting) recently received an Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204 for the following Facility ICR IDs.

- 1717400 (primary Facility ID; Part 1; ICR received December 8, 2016)
- 2853000 (Assigned Facility ID; Part 2; ICR received December 15, 2016)

To enable Whiting to provide the most accurate information possible, Whiting respectfully requests a 60-day deadline extension for both Parts I and II. This extension is necessary for Whiting to gather the extensive information requested and conduct the detailed quality assurance necessary to provide comprehensive and accurate information for the requested facilities.

As Whiting understands the requested information may be used in future rulemaking efforts, EPA benefits by receiving the most accurate and complete information possible. By granting this requested extension to provide Whiting 120 days to respond to Part I and 240 days to respond to Part II, EPA will be providing Whiting the requisite time necessary to provide complete and accurate information for EPA's review and consideration.

These requests, together, require Whiting to gather and review information for (b) (4) of facilities and associated wells. This effort requires substantial time and resources to ensure EPA is provided accurate and complete information. Indeed, EPA admits in the ICR's Fact Sheet that it "seeks a broad range of information." In addition to the effort required to gather the requested information, Whiting must then conduct data and information quality assurance. Following quality assurance efforts, Whiting must compile such data in the format requested

by EPA, as Whiting does not maintain data and information according to EPA's format. Further, information requested in Part 2 of the ICR will require detailed, labor-intensive, site-by-site calculations that will be difficult, if not impossible, to complete accurately within the allotted timeframe. As EPA is aware, this effort is requested to be completed during the end-of-year holidays, when (b) (6)

(b) (6) and also overlaps with, among others, onerous NSPS Subpart 0000 and Mandatory Greenhouse Gas Reporting Rule reporting deadlines. Lastly, Whiting must review all information and data to determine whether disclosure of any such would compromise confidential business information to protect its competitive advantage in the marketplace.

Section 114 provides no limit to the time EPA may provide an owner or operator to respond to an ICR such as this, and thereby provides EPA discretion, of course within reasonable bounds, to set appropriate deadlines. Whiting believes its request for a 60-day extension is reasonable and necessary to respond adequately to the aforementioned ICRs. As EPA will receive a massive collection of information from Industry, Whiting believes granting this requested deadline extension will not affect EPA's timeline for review.

The law supports providing a 60-day deadline extension for responding to the Part I and Part II Operator Surveys. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, EPA relies on §114(a)(1)(G), which authorizes EPA to request "such other information as the Administrator may reasonably require - requires EPA to set reasonable deadlines.

Thank you for your consideration of this request.

Respectfully requested,

(b) (6)

Whiting Petroleum Corporation

(b) (6)

Environmental Attorney

ORIGIN ID:DENA (303) 802-8366
KYLA LIVINGSTON
WHITING OIL & GAS
1700 BROADWAY
SUITE 2300
DENVER, CO 80290
UNITED STATES US

SHIP DATE: 22DEC16
ACTWGT: 0.10 LB
CAD: 104407788/NET3790

BILL SENDER

TO **BRENDA SHINE**
US EPA
1200 PENNSYLVANIA AVENUE, N.W.
28221T
WASHINGTON DC 20460

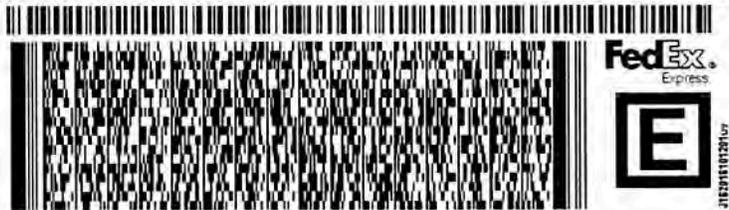
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(555) 555-5555

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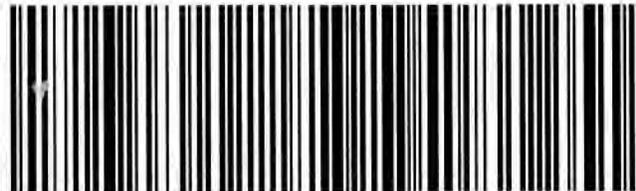


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STANDARD OVERNIGHT

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20460
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DAE-17-004280

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Lisa Thompson 1/5
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December 19, 2016

RECEIVED JAN 5 / 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

We recently received an Information Collection Request (ICR), EPA ICR No. 2548.01. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

TEP Rocky Mountain LLC



P.O. Box 370
1058 CR 215
Parachute, CO 81635

CERTIFIED MAIL™



7014 1200 0001 2952 9793

GRAND JUNCTION 815

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Hasler

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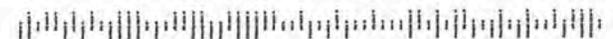


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R.T.P.N.C

**US Environmental Protection Agency
Office of Air Quality P&S/Brenda Shine
Mail Code 2822 IT
1200 Pennsylvania Ave NW
Washington, DC 20460**

DEC 27 2016



OAR 17-000-4284

PIA



Crescent Point

main / 720.880.3610
fax / 303.292.1562
toll free / 1.888.693.0020
555 17th Street, Suite 1800
Denver, Colorado
USA 80202

December 20, 2016

RECEIVED JAN 5 / 2017

left message 1/5
Lisa Thompson

Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: INFORMATION COLLECTION REQUEST
REQUEST FOR EXTENSION

Dear Mr. Tsirigotis:

We recently received three Information Collection Requests (ICR), EPA ICR No. 2548.01, addressed to Crescent Point Energy U.S. Corp, Legacy Oil & Gas ND Inc, and Corinthian Exploration (USA) Corp. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II for production wells and gathering and boosting compressor station and pipeline facilities, as applicable. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request. Please feel free to contact me at (b) (6) or at (b) (6) @crescentpointenergy.com if you have any questions or require additional information.

Sincerely,

(b) (6)

(b) (6)

Team Lead, Environmental
CRESCENT POINT ENERGY U.S. CORP

cc: Brenda Shine, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

OAR-17-000-4285

P 1/2

NEWFIELD



RECEIVED JAN 5 / 2017

January 4, 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code E143-01
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

Newfield Exploration Company
4 Waterway Square Place | Suite 100
The Woodlands, Texas 77380
PH 281-210-5100 | FAX 281-210-5101

called 1/5
Lise Thompson

RE: Petition for Extension of Submittal Deadlines for Information Collection Request

Dear Ms. Shine:

On December 19th, 2016 Newfield Exploration Company (Newfield) requested a 60-day extension of the respective deadlines for Parts I and II of the Information Collection Request (ICR), EPA ICR No. 2548.01 (see attached).

I ask that any questions or responses concerning this request be directed to me. My contact information is as follows:

(b) (6)

Corporate Air Quality Manager
Newfield Exploration Company
4 Waterway Square Place, Suite 100
The Woodlands, TX 77380

(b) (6)

Sincerely,

(b) (6)

(b) (6)

RECEIVED JAN 5 / 2017



Newfield Exploration Company
Waterway Square Place | Suite 400
The Woodlands, Texas 77380
PH 281-210-5100 | FAX 281-210-5101

December 19, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code E143-01
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Petition for Extension of Submittal Deadlines for Information Collection Request

Dear Ms. Shine:

Newfield Exploration Company (Newfield) requests a 60-day extension of the respective deadlines for Parts I and II of the Information Collection Request (ICR), EPA ICR No. 2548.01. Newfield finds the ICR unprecedented in terms of the breadth and depth of detail it requests. The requested extension is necessary in order to provide EPA with the most accurate information possible.

Newfield is an independent Exploration and Production company headquartered in The Woodlands, Texas with operations in the Anadarko, Uinta and Williston Basins. Despite Newfield's being a small business with fewer than (b) (4) employees, the company currently owns and operates nearly (b) (4) wells. The portfolio of Newfield's assets has changed significantly in recent months due to multiple divestitures and one significant acquisition.

Both Parts I and II require very specific detailed information about wells and equipment owned or operated by Newfield. In fact, EPA admits in the Fact Sheet for the ICR that it "seeks a broad range of information." Many entities pointed out during the rule public comment period that EPA had underestimated the amount of time, effort, and resources required to faithfully complete the ICR.²

Part I asks Newfield to provide data for each well and its corresponding tank battery. This will require substantial time and resources. The Part II survey is incredibly detailed and burdensome. An initial review indicates that Newfield will have to complete a Part II survey for (b) (4) production and (b) (4) gathering and boosting facility and will need to take numerous pressurized samples. This will necessitate significant coordination with each facility and a contractor/laboratory to take and analyze the samples. As every operator required to complete a Part II survey will be hiring contractors to collect samples, Newfield anticipates delays in working with the laboratories. With both parts, Newfield will need to collect data from multiple locations, conduct in-depth QA/QC to validate the information, and

² See, e.g., Western Energy Alliance Comments 2 (Oct. 31, 2016), available at <http://www.regulations.gov>, EPA-HQ-OAR-2016-0204-0180 (noting that industry pilot programs indicate that the labor costs associated with Part I may be three to five times higher than EPA's estimate).

ORIGIN: MEX (b) (6) (281) 210-5261
NEWFIELD EXPLORATION
24 WATERWAY AVENUE
SUITE 900
THE WOODLANDS, TX 77380
UNITED STATES US

SHIP DATE: 04JAN17
ACTWGT: 1.00 LB
CAD: 103208748/NET3790

BILL SENDER

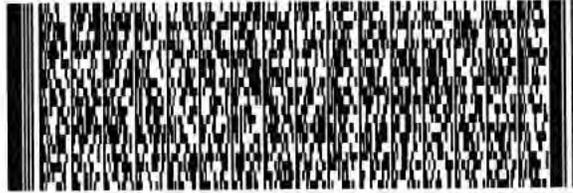
TO **BRENDA SHINE**
US EPA
109 T.W. ALEXANDER DR
MAIL CODE E143-01
RESEARCH TRIANGLE PA NC 27709

(919) 541-2249
INV
PO 950027860

REF DOUG HENDERER

DEPT 4WW

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Express



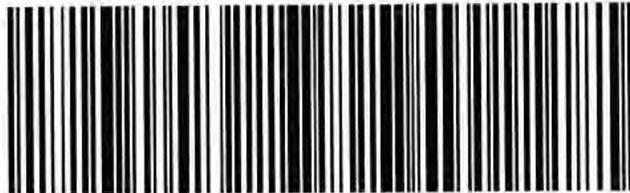
11/11/17

THU - 05 JAN 3:00P
STANDARD OVERNIGHT

TRK# 7780 9825 2454
0201

XH MXEA

27709
NC-US RDU



OAR-17-000-4274

P2

enerPLUS

Lisa Thompson
called 1/5

December 12, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

RECEIVED JAN 5 / 2017

Dear Ms. Shine:

On December 9, 2016, Enerplus Resources (USA) Corporation ("Enerplus") received a Part 2 – Detailed Facility Survey Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204. To provide EPA with the most accurate possible information, we respectfully request a 60-day extension for the Part 2 response. This extension is necessary for Enerplus to ensure adequate sampling points exist, pull necessary samples for laboratory analysis and for Enerplus to perform the necessary detailed review and uploading of the most accurate information. The 60-day extension request would set a new Part 2 Enerplus completion deadline for the Part 2 response of August 6, 2017.

Thank you for your consideration of this request. If you should have any questions or require additional detail, please don't hesitate to contact me via email at (b) (6)@enerplus.com or via phone at (b) (6) (b) (6).

Sincerely,

(b) (6)

Lead – Environmental Programs

enerPLUS

ENERPLUS RESOURCES (USA) CORPORATION



Denver, Colorado 80202-2805

CERTIFIED MAIL™



7012 3050 0000 7167 0751



DEC 19 2016

Office of Air Quality Planning & Standards
U.S. Environmental Protection Agency
Mail Code 2822IT, 1200 Pennsylvania Ave N.W
Washington, DC 20460

20480-

|||||
Attn: Brenda Shine



OAP-17-000-4232

1402

sent her 1-11-17

RECEIVED JAN 13 11 2017

January 6, 2017

Oasis Petroleum
1001 Fannin Street, Suite 1500
Houston, TX 77002

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Request for Extension of EPA Oil and Gas ICR Submission Deadlines

Dear Ms. Shine:

We received three letters regarding EPA Information Collection Request (ICR) No. 2548.01 on December 9, 2016. Based on the receipt date, we are required to submit responses to Part 1 and Part 2 by February 7, 2017 and June 7, 2017, respectively. Oasis Petroleum is committed to providing the most accurate and complete information possible, and to that end we respectfully request a 30-day extension for both Parts 1 and 2 of the ICR, making our proposed submission deadlines March 9, 2017 and July 7, 2017, respectively.

Given the extensive scope of information sought, we are confident that additional response time is absolutely necessary. Much of the requested information will require calculations and determinations drawn from disparate data sources; some information will require detailed, site-specific reviews; and all information will require thorough review prior to submission to ensure accuracy. In addition, practical questions regarding EPA's preferred organization of data, among other preliminary matters, have caused delays as we await further direction. Granting a 30-day extension for both Parts 1 and 2 will allow our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Respectfully,

(b) (6)

(b) (6)

Regulatory Manager
Oasis Petroleum

(b) (6)

Enclosure: Documentation of certified mail receipt of ICR letters

Cc: Peter Tsirigotis, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

Tracking Number: 92148969009997901735384356



Delivered

Product & Tracking Information

Postal Product:
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DATE & TIME	STATUS OF ITEM	LOCATION
December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:56 pm on December 9, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 4:20 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:20 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:24 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:24 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:09 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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0002008678 DEC 05 2016
MAILED FROM ZIP CODE 27284

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Tracking Number: 92148969009997901735385384



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Your item was delivered to an individual at the address at 2:23 pm on December 10, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 11:48 pm	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 9, 2016 , 5:56 am	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:49 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:49 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:34 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS. USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



9214 8969 0099 9790 1735 3853 84

11/11/16 10:11:11 AM

Tracking Number: 92148969009997901735385704



Delivered

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DATE & TIME	STATUS OF ITEM	LOCATION
December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:56 pm on December 9, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 4:13 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:21 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:41 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:41 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:26 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates

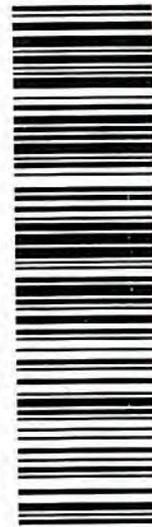




Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



9224 8969 0099 9790 2735 3857 04



CERTIFIED MAIL™





1001 Fannin, Suite 1500
Houston, Texas 77002

X

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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7015 3010 0000 6542 3935

Peter Tsirigotis
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: D205-01
Research Triangle Park, NC 27709



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OAR-17-000-4238

1+2



3

January 6, 2017

RECEIVED JAN 10 2017

Mr. Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

RE: Request for Extension to Respond to the Information Collection Request (ICR) for the Oil & Natural Gas Sector—Part 1 & Part 2

Facility ID 1112400 – Carrizo (Eagle Ford) LLC
Facility ID 1112450 – Carrizo (Marcellus) LLC
Facility ID 1112500 – Carrizo (Permian) LLC
Facility ID 1112550 – Carrizo (Utica) LLC
Facility ID 1112650 – Carrizo (Niobrara) LLC
Facility ID 1112700 – Carrizo Oil & Gas, Inc.

Dear Mr. Tsirigotis:

On December 9, 2016, Carrizo received multiple letters from you dated November 14, 2016, requesting information regarding the above referenced facilities. For the following reasons, Carrizo is respectfully requesting an extension to the 60 days and 180 days required to respond to the ICR Part 1 and Part 2 surveys, respectively.

Carrizo is concerned that the ICR due dates have not taken into consideration multiple federal holidays that fall within the allotted 60 day/180 day turnaround. Additionally, due to the December holidays, limited staff is/have been available to collect, review, and prepare the requested data. Furthermore, the ICR project is concurrent with multiple other state and federal air quality reporting obligations Carrizo must comply with including NSPS OOOO reporting, Annual GHG Subpart W reporting, Annual Emissions Inventories, and Annual Permit Evaluation Reports. Carrizo is diligently working to comply with the ICR requirements, while also balancing the reporting burden of other existing and ongoing environmental, air quality obligations.

In addition to requesting additional time to complete Part 1 and Part 2, Carrizo has concerns on how to handle various elements of the data being collected, which are outlined below:

- What is an acceptable "Surface Site ID"? Many of Carrizo's facilities either have multiple State-issued permits/registration numbers or the facilities are authorized under Exemptions which don't have assigned permit/registration numbers.
- How do we account for gunbarrel tanks in the tank and/or separator category(ies)? At Carrizo, we consider gunbarrel tanks to be storage tanks; however, they do separate some oil from water as a result of their basic function. How would EPA like to have this particular equipment type addressed?
- What is an appropriate response to Part 2 surveys for which non-operated (non-op) wells and/or divested wells have been selected? Carrizo had (b) (4) wells selected as part of the Part 2 Well Selection, but these wells are either operated by another company (Carrizo shares an interest in the well) or the wells have been sold to another operator and are no longer under Carrizo's control or ownership.

Thank you for your consideration of Carrizo's request, and we look forward to clarification for our questions above. If you have any questions, or if more information is needed, please feel free to contact me by phone at (713) 328-1000 or by email at (b) (6) @carrizo.com.

Sincerely,

(b) (6)

(b) (6)

Director of Compliance

Cc: Ms. Brenda Shine
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

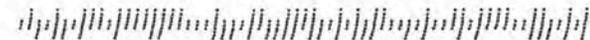


CARRIZO OIL & GAS, INC.
500 DALLAS STREET • SUITE 2300
HOUSTON, TEXAS 77002

Ms. Brenda Shine
Office of Air Quality Planning & Standards
US Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle, NC 27709

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27709\$0310 R777



0AR-17-000-4239

LAREDO

PETROLEUM, INC.

15 W. 6th Street, Suite 900 • Tulsa, Oklahoma 74119
Phone: (918) 513-4570 • Fax: (918) 513-4571

RECEIVED JAN 10 2017

*Extension granted via email.
Laredo also requested
an extension via
email. JTB*

1/10/17

*✓ 16 Part 1+2
Henry*

January 4, 2017

Via Certified Mail
#7013 2250 0001 3488 3319

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility IDs 1377100 & 2443000

Dear Mr. Tsirigotis:

I am the Corporate HS&E Director for Laredo Petroleum, Inc. ("Laredo"). On December 8, 2016, Laredo received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facilities. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

Laredo is, in relevant terms, a smaller operator. In our EH&S department we currently have **(b) (4)** individual tasked with overseeing our air quality compliance, and **(b) (4)** is responsible for collecting information on approximately **(b) (4)** wells/facilities spread out over approximately 1160 square miles. Much of the information **(b) (4)** requested in your correspondence is not readily available and will require visits to each site or visual inspections of aerial photographs of every location, as this is not a task that can be delegated to someone else. As you know, this data collection and response requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability for errors.

In addition to limited personnel resources, the ICR falls partially over the holiday season and at the end of the year when (b) (6)

I would also note that the timing for the ICR could not be worse given the required reporting requirements associated with annual emissions inventory, annual greenhouse gas ("GHG") reporting, and Sara Title III. Given Laredo's limited personnel, I have to balance reporting obligations and the ICR while continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities (i.e. required inspections, permitting requirements, and preparation for multiple compliance deadlines associated with NSPS OOOOa).

Further, it is unclear to me how to calculate the precise due date of the response because of the holidays; therefore, I ask that you indicate in your response when the EPA considers the response due.

Considering the time it is taking/will continue to take to complete the Part 1 Survey (not to mention the time to complete our GHG reporting and maintain compliance with existing state and federal environmental regulations) we project that we will not be able to make much if any progress on the Part 2 Survey until after our GHG reporting is complete on March 31st. This means that while you have provided 180 days to complete the Part 2 Survey, our actual time to work on it is approximately 67 days based on our receipt of the ICR on December 8th, 2016. While we will work diligently to fulfill the ICR, Laredo simply does not have the resources to work concurrently on both Surveys while also addressing the current environmental regulatory burden.

Finally, in addition to requesting additional time to respond for the reasons set forth above, certain aspects of the Part 1 Survey and Part 2 Survey are unclear to me. Therefore, I request clarification of the following:

- *How should a vapor recovery unit (VRU) be treated in Part 1? Specifically, these are reciprocating type compressors but our VRU's do not have rod packing and operate at low pressure. Gas that gets by the cylinders is captured in the blow case and recycled into suction. If we report these as reciprocating compressors my concern is that they will be treated the same as a high pressure reciprocating compressor and therefore emission estimates will be overestimated. (b) (4) of Laredo's reciprocating compressors are low pressure VRU's. None of our Part 2 facilities have a VRU associated with it therefore I don't believe that EPA will be able to discern the difference between a VRU and high pressure reciprocating units. Please advise us on how to address these units.*
- *In the Part 2 Survey Production Wells tab there is a column for "Type of well bore". The options are multilateral design or capillary string. However, we would not consider many of our wells to be either of these options. Please provide information on how we should answer this question.*

already resolved

Page 3
January 4, 2017
Mr. Peter Tsirigotis

I am certain that there are additional questions that we will have when we get the chance to begin to address Part 2 of the Survey.

Please contact me if you have any questions and I look forward to hearing from you on both our request for an additional 60 days, and the answers to my questions addressed above.

Sincerely,

(b) (6)

(b) (6)

Laredo Petroleum, Inc.
Corporate HS&E Director

cc: Ms. Brenda Shine ✓
Via Certified Mail #7013 2250 0001 3488 3302

LAREDO
PETROLEUM, INC.

15 West 6th Street, Suite 900
Tulsa, Oklahoma 74119

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



7013 2250 0001 3488 3302

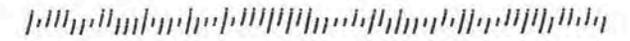


US POSTAGE
\$06.46

Mailed From 74119
01/04/2017
031A 0005181108

Ms. Brenda Shine
Office, Air Quality Planning & Standard
United States Environmental Protection
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709+0310



OAR-17-000-4250
p1+2



RECEIVED JAN 10 2017
Troy Jordan
Director, Environmental

December 14, 2016

VIA CERTIFIED MAIL NO. 7190 1084 2180 0252 3551

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW,
Washington, DC 20460

4

Dear Ms. Shine:

Chesapeake Energy received Information Collection Requests (ICRs) per Docket ID No. EPA-HQ-OAR-2016-0204 for the following 14 Facility IDs on or about December 5, 2016:

1125600, 1125650, 1125700, 1317800, 1312100, 1187350, 1636700,
1557750, 1085250, 1335250, 1229200, 1143700, 1545850, 2144000

These ICRs are unprecedented in terms of the breadth and depth of detail of information EPA is requesting.

In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for all Part I requests and a 180 day extension for all Part II requests. These extensions are both reasonable and necessary as much of the information will require detailed and facility-specific information, including equipment counts and product composition analyses. The current time allotted is insufficient to thoroughly and accurately compile, review and submit the information requested.

By granting these extensions and allowing 120 days from receipt of each ICR to respond to Part I and 360 days from receipt of each ICR to respond to Part II, EPA will be giving Chesapeake Energy much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

Director, Environmental
Chesapeake Energy

Chesapeake Energy Corporation

P.O. Box 18496 • Oklahoma City, OK • 73154-0496 • 6100 N. Western Avenue • Oklahoma City, OK 73118
Telephone: (405) 935-4503 • Fax: (405) 849-4503 • troy.jordan@chk.com



7190 1084 2180 0252 3551

U.S. Environmental Protection Agency
Brenda Shine
Office of Air Quality Planning and Standards
Mail Code 28221T, 1200 Pennsylvania Ave.
NW.
Washington D.C., D.C. 20460

Chesapeake Energy Corporation
P.O. Box 18496
Oklahoma City, OK 73154-0496

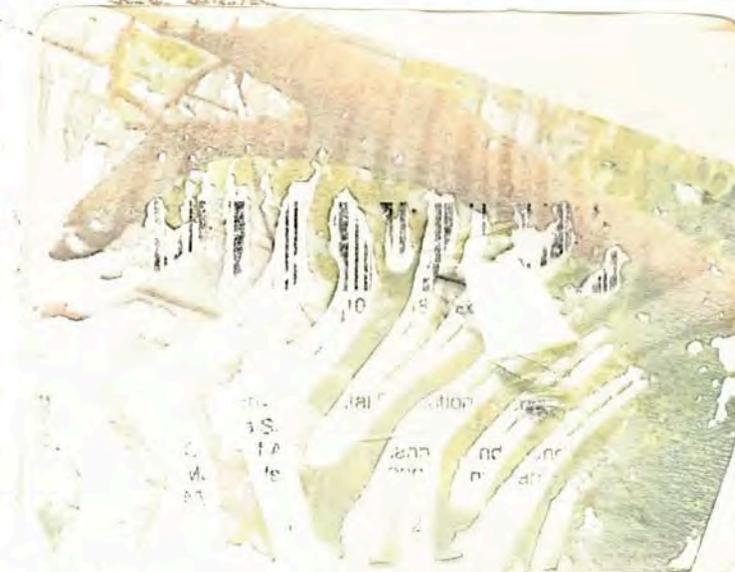
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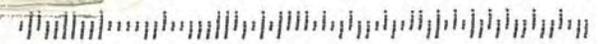


ZIP 73118
041L12202514



RTP.
NC

E143-01



OAR-17-000-4252
I+A



X

RECEIVED JAN 10 2017

December 15, 2016

(b) (6)

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Oklahoma City, OK
73105

(b) (6)

PO Box
Okl City, OK 73126

Dear Ms. Shine:

We recently received an Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,
CONTINENTAL RESOURCES, INC.

(b) (6)

(b) (6)

Senior Environmental Director

- cc: Jodi Howard, USEPA Research Triangle Park
- (b) (6) Northern Region Environmental Manager
- (b) (6) Southern Region Environmental Manager
- (b) (6) Senior Environmental Specialist
- (b) (6) Senior Staff Engineer



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Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

DEC 22 2016

E143-01

20460-



OAR-17-000-4263 P1+2



January 4, 2017

Certified Mail: 7016 1370 0001 1980 5391

Ms. Brenda Shine
U.S. EPA
109 T.W. Alexander Drive Mailcode: E143-01
Research Triangle Park, NC 27709


RECEIVED JAN 10 2017

RE: Information Collection Request
Midstates Petroleum Corporation
Primary Facility ID# 1436600

Dear Ms. Shine:

Midstates Petroleum (Midstates) is in receipt of two letters from Mr. Peter Tsirigotis, Director of the Sector Policies and Programs Division of the EPA's Air Quality Planning and Standards Office. These letters were received on December 8, 2016 and requested data with respect to our production facilities.

I have reviewed the request and Midstates will provide our facility data as soon as practical. However, as you well know the amount of information being requested is extensive and will require an appreciable amount of time to gather and populate the forms EPA has provided.

That said, we have some points which we need EPA to clarify before we can respond.

- 1) The analytical data you have requested seems to ask for three sampling points per well, but our well pads have three or sometimes four well production lines running in parallel. Are we to only provide information for a single line? Twelve sample locations seems excessive and overly burdensome when each production line would be running under similar conditions and the product originating from the same general area of the basin in question.
- 2) We requested, via letter and email, an extension to the deadline for responding to Part 1 of the survey. We have not received any acknowledgement or reply. The extension request for our Part 1 response asked to extend the deadline to March 8, 2017. Please provide a response to our request.
- 3) We additionally request an extension to the Part 2 request of 60 days. This would put our response deadline at August 8, 2017.
- 4) While filling out *Section 3-Gas Composition* of the Facility worksheet in the Part 2 spreadsheet we noticed that Methane is not listed in the *Components* list. Will there be a revised spreadsheet that includes Methane in the gas component list or are we to omit Methane from our response?
- 5) One of the wells selected for the Part 2 ICR is an (b) (4) [REDACTED] (b) (4) [REDACTED] As such, we do not have information regarding well pressure or GOR in the first

30 days of production (columns W and AJ, *Section 2-General Well Information* of the **ProdnWells** worksheet). Should we leave these cells in the worksheet blank?

- 6) *Section 2-General Tank/Separator Information* of the **Tanks Separator** worksheet requires that separators discharging liquids to atmospheric storage tanks be listed and a reason given if a tank or separator is not subject to OOOO. The only choices for exemption from OOOO are: (1) *Less than 6 tpy of VOC*; (2) *Date of installation*. The separators at the site are not subject to OOOO because they are not considered storage vessels by definition; these vessels are designed to operate in excess of 204.9 kPa (29.7 psig) without emissions to the atmosphere. What should we put as the reason in column G, Part 2 of this worksheet?

Midstates will make a good faith effort to respond to your requests to provide the data by the new deadlines, but we need your help in clarifying how we are to respond. Should you have any questions you may contact (b) (6) of my staff, at (b) (6) @midstatespetroleum.com or by telephone at (b) (6)

Respectfully,

(b) (6)

(b) (6)

Vice President, EHS
Midstates Petroleum



321 South Boston
Suite 1000
Tulsa, OK 74103

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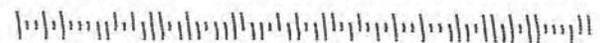


7016 1370 0001 1980 5391



Ms. Brenda Shine
U.S. EPA
109 T.W. Alexander Drive Mailcode: E143-01
Research Triangle Park, NC 27709

27709#0310 R777





OAR-17-0004254

P1+2

9

RECEIVED 2017 0 2017

January 6, 2017

Oasis Petroleum
1001 Fannin Street, Suite 1500
Houston, TX 77002

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Request for Extension of EPA Oil and Gas ICR Submission Deadlines

Dear Ms. Shine:

We received three letters regarding EPA Information Collection Request (ICR) No. 2548.01 on December 9, 2016. Based on the receipt date, we are required to submit responses to Part 1 and Part 2 by February 7, 2017 and June 7, 2017, respectively. Oasis Petroleum is committed to providing the most accurate and complete information possible, and to that end we respectfully request a 30-day extension for both Parts 1 and 2 of the ICR, making our proposed submission deadlines March 9, 2017 and July 7, 2017, respectively.

Given the extensive scope of information sought, we are confident that additional response time is absolutely necessary. Much of the requested information will require calculations and determinations drawn from disparate data sources; some information will require detailed, site-specific reviews; and all information will require thorough review prior to submission to ensure accuracy. In addition, practical questions regarding EPA's preferred organization of data, among other preliminary matters, have caused delays as we await further direction. Granting a 30-day extension for both Parts 1 and 2 will allow our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Respectfully,

(b) (6)

(b) (6)

Regulatory Manager
Oasis Petroleum

(b) (6)

Enclosure: Documentation of certified mail receipt of ICR letters

Cc: Peter Tsigotis, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

Tracking Number: 92148969009997901735384356



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Product & Tracking Information

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DATE & TIME	STATUS OF ITEM	LOCATION
December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:56 pm on December 9, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 4:20 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:20 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:24 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:24 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:09 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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December 9, 2016 , 5:56 am	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:49 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:49 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:34 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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11/11/16 10:11 AM

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December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

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December 8, 2016 , 1:21 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:41 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:41 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:26 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

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Email Updates

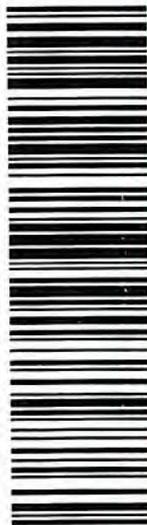




Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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1001 Fannin, Suite 1500
Houston, Texas 77002

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Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, NC 27709



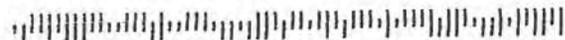
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10

RECEIVED JAN 11 2017

January 5, 2016

Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Dear Ms. Shine:

SG Interests I, Ltd. (SG) (Facility ID 1596300) is in receipt of an Information Collection Request dated November 14, 2016 and received by SG on December 9, 2016. SG needs more time to gather the information requested and hereby requests a 60 day extension to respond for both Parts I and II. This would result in 120 days to respond to Part I and 240 days to respond to Part II. The extension will allow SG the time necessary to provide accurate and complete information.

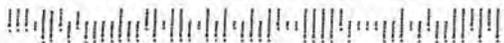
Thank you for your consideration of this request.

Sincerely,

SG Interests I, Ltd.
By: Gordy Oil Company
General Partner

(b) (6)

(b) (6)
Vice President - Land



SG INTERESTS I, LTD.
100 WAUGH DRIVE, SUITE 400
HOUSTON, TEXAS 77007

To Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Dr. Mail code: E243-01
Research Triangle Park, NC 27709

CAR-17-000-5606

P1+2

DIVIDE CREEK GATHERING SYSTEM, LLC

C/O SG Interests I, Ltd.
100 Waugh, Suite 400
Houston, Texas 77063
713.951.0100

1/11/2017

January 5, 2016

Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Dear Ms. Shine:

Divide Creek Gathering System, LLC (Divide Creek) (Facility ID 5002710) is in receipt of an Information Collection Request dated November 14, 2016 and received by Divide Creek on December 6, 2016. Divide Creek needs more time to gather the information requested and hereby requests a 60 day extension to respond for both Parts I and II. This would result in 120 days to respond to Part I and 240 days to respond to Part II. The extension will allow Divide Creek the time necessary to provide accurate and complete information.

Thank you for your consideration of this request.

Sincerely,

Divide Creek Gathering System, LLC

(b) (6)

(b) (6)

Management Committee Member

Cc: (b) (6)
Gunnison Energy Corporation
1801 Broadway, Suite 1200
Denver, CO 80202

OAR-17-000-5610

P1+2



And try-11-17

January 6, 2017

RECEIVED JAN 13 2017

1/11/2017

Mr. Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

RE: Request for Extension to Respond to the Information Collection Request (ICR) for the Oil & Natural Gas Sector—Part 1 & Part 2

Facility ID 1112400 – Carrizo (Eagle Ford) LLC
Facility ID 1112450 – Carrizo (Marcellus) LLC
Facility ID 1112500 – Carrizo (Permian) LLC
Facility ID 1112550 – Carrizo (Utica) LLC
Facility ID 1112650 – Carrizo (Niobrara) LLC
Facility ID 1112700 – Carrizo Oil & Gas, Inc.

Dear Mr. Tsirigotis:

On December 9, 2016, Carrizo received multiple letters from you dated November 14, 2016, requesting information regarding the above referenced facilities. For the following reasons, Carrizo is respectfully requesting an extension to the 60 days and 180 days required to respond to the ICR Part 1 and Part 2 surveys, respectively.

Carrizo is concerned that the ICR due dates have not taken into consideration multiple federal holidays that fall within the allotted 60 day/180 day turnaround. Additionally, due to the December holidays, limited staff is/have been available to collect, review, and prepare the requested data. Furthermore, the ICR project is concurrent with multiple other state and federal air quality reporting obligations Carrizo must comply with including NSPS OOOO reporting, Annual GHG Subpart W reporting, Annual Emissions Inventories, and Annual Permit Evaluation Reports. Carrizo is diligently working to comply with the ICR requirements, while also balancing the reporting burden of other existing and ongoing environmental, air quality obligations.

In addition to requesting additional time to complete Part 1 and Part 2, Carrizo has concerns on how to handle various elements of the data being collected, which are outlined below:

- What is an acceptable "Surface Site ID"? Many of Carrizo's facilities either have multiple State-issued permits/registration numbers or the facilities are authorized under Exemptions which don't have assigned permit/registration numbers.
- How do we account for gunbarrel tanks in the tank and/or separator category(ies)? At Carrizo, we consider gunbarrel tanks to be storage tanks; however, they do separate some oil from water as a result of their basic function. How would EPA like to have this particular equipment type addressed?
- What is an appropriate response to Part 2 surveys for which non-operated (non-op) wells and/or divested wells have been selected? Carrizo had (b) (4) wells selected as part of the Part 2 Well Selection, but these wells are either operated by another company (Carrizo shares an interest in the well) or the wells have been sold to another operator and are no longer under Carrizo's control or ownership.

Thank you for your consideration of Carrizo's request, and we look forward to clarification for our questions above. If you have any questions, or if more information is needed, please feel free to contact me by phone at (713) 328-1000 or by email at

(b) (6) [@carrizo.com](mailto:(b) (6)@carrizo.com).

Sincerely,

(b) (6)

(b) (6)

Director of Compliance

Cc: Ms. Brenda Shine
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

Cimarex Energy Co.
202 S. Cheyenne Ave.
Suite 1000
Tulsa, Oklahoma 74103-4346
PHONE 918.560.7257
FAX 539.777.0501

CAE-17000-4251

pg

email sent in lieu
of hard copy.
Spoke to Ms.
McConium.

(b) (6)

1/10/17

Stuart Wittenbach
ES&H Director

CIMAREX

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January 5, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED
JAN 10 2017

Re: Information Collection Request – Part 2, CAA §114 Request for Extension

Dear Ms. Shine:

Cimarex Energy Co. (Cimarex) received the Part 2 Information Collection Request (ICR) for Oil and Gas Production Facilities on December 8, 2016, and for Gathering and Boosting Facilities on December 12, 2016. Cimarex is kindly requesting these be submitted concurrently and an extension of 90 days be granted, having the deadline for submittal be September 8, 2017.

The law supports providing a 90-day extension of the deadline for responding to the Part 2 Operator Survey. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case – § 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator *may reasonably* require” – requires EPA to set reasonable deadlines.

The Part 2 Operator Survey asks for detailed information and sample collection and processing for the selected facilities. The completion of the Part 2 survey will take effort and collaboration from different region operations and departments within Cimarex, in addition to working with consulting groups and third party laboratory services that could have potential delays. This process will require substantial time and resources, and a thorough QA/QC of the data will be necessary to verify its accuracy and compile the data into the form requested by the Agency. All of these must be completed whilst completing the Part 1 ICR. The 180-day deadline imposed by the ICR is considered an unreasonable amount of time in which to complete this work.

Notably, EPA is under no legally enforceable deadline for completing the § 111(d) regulation for which this information is being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 90-day extension will not prevent EPA from meeting legal obligations and will not unreasonably delay issuance of the rule.

Should you or members of your staff have any questions or require additional information, please contact me at (918)560-7257 or via email at (b) (6)@cimarex.com.

Ms. Brenda Shine, U.S. EPA
January 5, 2017
Pg. 2 of 2

Sincerely,
Cimarex Energy Co.

(b) (6)

A large black rectangular redaction box covers the majority of the page's content, starting below the signature and ending above the distribution list.

Stuart Wittenbach
ES&H Director

cc: Peter Tsirigotis, U.S. EPA Director, Sector Policies and Programs Division, Office of Air Quality
Planning and Standards

Certified Mail (94148102 00793257 507051)

Air Quality Library File: AQ-11-01 (ICR Part 2 Extension Request)

1/5/2017

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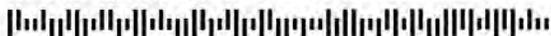
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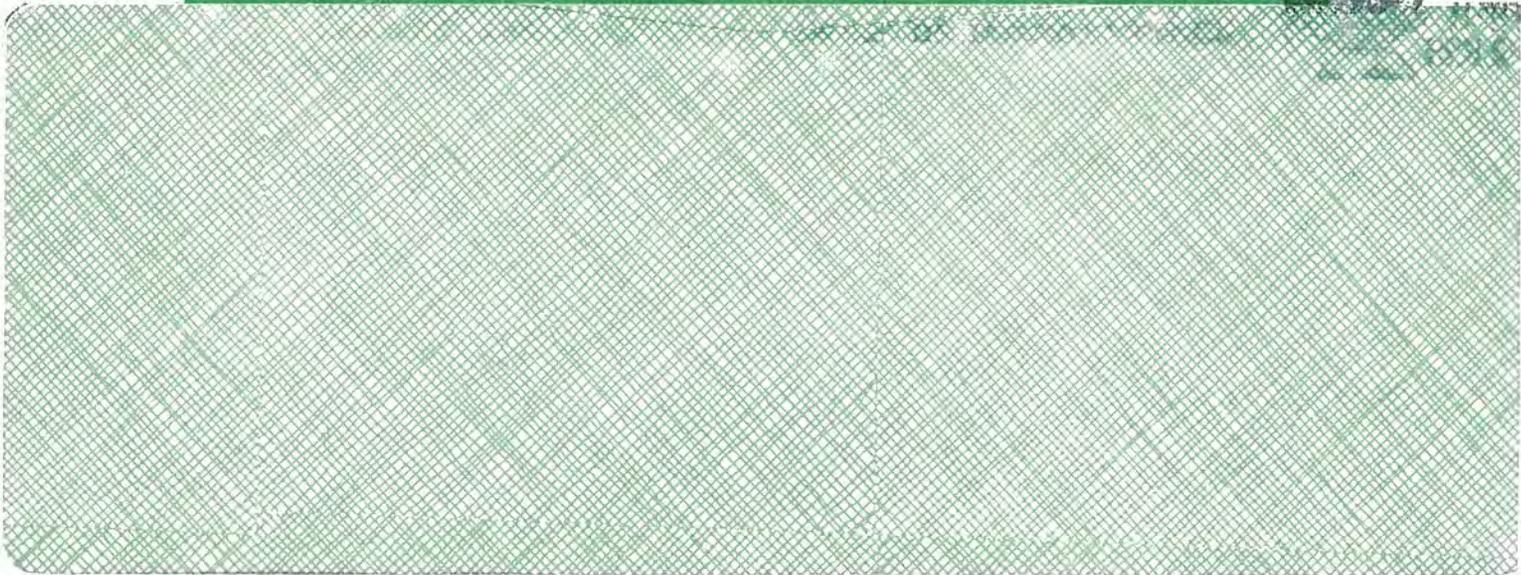
US EPA - Research Triangle Park
Ms. Brenda Shine
E143-01
109 T. W. Alexander Drive
RESEARCH TRIANGLE PARK NC 27709-0002



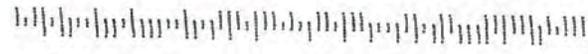
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TULSA OK 741



27709#0310 R777





0912-17-000-4290 P1

DELTA CO2, LLC
P.O. BOX 387 • PHONE: 254/559-9841
BRECKENRIDGE, TEXAS 76424-0387

January 6, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

**RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID 1178850 Delta CO2, LLC**

Dear Mr. Tsirigotis:

On December 9, 2016, my company, Delta CO2, LLC, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

As a result of market conditions we have trimmed our staff to [REDACTED] employees and they are responsible for collecting information on [REDACTED] wells spread out over Yoakum and Gaines County. Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season (b) (6) [REDACTED]. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me.

- Whose responsibility is it to respond when there is more than one owner?
- Whose responsibility is it to respond when the operator is different than the owner?

Mr. Peter Tsirigotis

January 6, 2017

Page 2

- All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?
- I have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. How does EPA view this equipment?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

(b) (6)

Delta CO2, LLC
Director of Special Projects

cc: Ms. Brenda Shine



DELTA CO2, LLC
P.O. BOX 387
BRECKENRIDGE, TEXAS 76424-0387



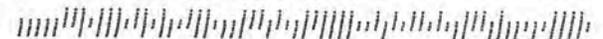
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X

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

2770930310 R777





HURD ENTERPRISES, LTD.

OAL-17-000-4344

P141

RECEIVED JAN 13 2017

January 10, 2017

United States Environmental Protection Agency
Washington DC 20460

RE: Section 114 Letter received December 8, 2016

To Whom It May Concern:

We request an extension of time to comply with the EPA's request as described in the Section 114 correspondence dated November 14, 2016 and received by Hurd Enterprises on December 8, 2016, to provide information related to our oil gas properties. The reason an extension is required is due to the personnel needed to gather and compile the information requested.

Hurd Enterprises is currently without (b) (4)

(b) (4) This is hampering our efforts to comply with this request in a timely manner as we engage (b) (4)

Based on the date the letter was received by Hurd Enterprises, the original due date would be February 6, 2017. We formally request a 60-day extension of time to supply the information requested in the Section 114 letter resulting in a revised due date of April 7, 2017.

Thank you for your consideration.

Very truly yours,

Hurd Enterprises, Ltd.

By its General Partner, Hurdco, Inc.

(b) (6)

E. Eugene Garcia, President



7373 BROADWAY, SUITE 200
SAN ANTONIO, TX 78209

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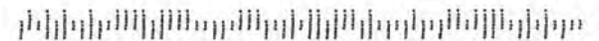
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SAN ANTONIO
TX 7820
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Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





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P 42

COLTON ENVIRONMENTAL MANAGEMENT

01-04-17

RECEIVED JAN 13 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID: 1514800
Pinnacle Operating Company, Inc.
P. O. Box 52074
Shreveport, LA 71135-2074

Dear Mr. Tsirigotis:

Our company Colton Environmental Management, Inc., (CEM) has been contracted by Pinnacle Operating Company, Inc. (POC) to help address and answer the EPA's Information Collection Request (ICR) pertaining to Section 114 of the Clean Air Act (CCA). On 12-12-16, Pinnacle Operating, Inc., received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, we respectfully request an extension of 90 days to respond to the information collection request (ICR).

As a result of market conditions in the Oil & Gas industry both CEM and POC have had to reduce our staff over the last few years. Those of us who are remaining are responsible for collecting information on approximately (b) (4) wells spread out over an estimated (b) plus miles reaching from South Central Arkansas to Central Louisiana and over to Central East Texas. Much of the information is not readily available for each site and will require us to personally visit some of the sites. As you know, this information collection requests requires us to certify to the accuracy of the information provided to the United States Environmental Protection Agency (EPA) and subjects our clients to criminal liability, so therefore we want to have time to be sure and submit the correct data. Also, it is unclear to us how to calculate when the response is currently due because of the holidays and request that you indicate in your response when the EPA considers the response due for POC.

ICR Extension Request

Facility ID: 1514800
Pinnacle Operating Co., Inc.
P. O. Box 52074
Shreveport, LA 71135-2074

Along with the complications associated with limited staff and holidays, the ICR deadline stretches us to be in compliance with the annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III programs being due soon. With CEM's and POC's limited staff we have to meet current obligations and the ICR along with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are diligently working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

CEM and POC would greatly appreciate you and/or the EPA granting our extension request. I can be reached at the following email, mailing address or phone.

Respectfully:

(b) (6)

Colton Environmental Management, Inc.
William M. Massey
President, RSO

Mailing Address: Colton Environmental Management, Inc.
Attn: William M. Massey
P. O. Box 6076
Shreveport, LA 71136

Email Address: (b) (6) @coltonenvironmental.com

Office Phone: (b) (6)

Cell Phone: (b) (6)

cc: Ms. Brenda Shine

Colton Environmental
P.O. Box 6076
Shreveport, LA 71136

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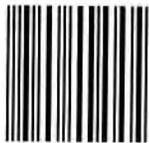


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Mr. Peter Tsirigotis
Director Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States EPA
109 T. W. Alexander Drive
Research Triangle Park, NC 27709



MERIT ENERGY COMPANY

OAR-17-000-4347

P142

13727 Noel Road · Suite 1200 · Dallas, Texas 75240
Ph 972.701.8377 · Fx 972.960.1252 · www.meritenergy.com

January 6, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1431300 Merit Energy Company, LLC
Facility ID 2514000 Merit Energy Company, LLC
Facility ID 3006010 Merit Energy Company, LLC

Dear Mr. Tsirigotis:

Merit Energy Company, LLC (Merit) received your letters dated November 14, 2016, on December 8, 2016, December 9, 2016 and December 13, 2016. The Information Collection Request (ICR) letters are requesting extensive information regarding the above referenced Facilities. Merit Energy Company, LLC respectfully requests a 90-day extension of the deadline to respond to the information collection request ("ICR").

Merit made several acquisitions of oil and gas properties during the last half of 2016. Some of those acquisitions were effective November 1, 2016 and covered numerous assets in multiple states and counties. Therefore, Merit needs the additional time to obtain the required information from the previous operators. Much of the information is not readily available due to the previous owners and operators reduction in staff resulting from the economic conditions of the oil and gas industry. Personal site visits by environmental specialists will be needed to gather the data which will take additional time.

The ICR requires a certification to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects Merit to criminal liability. In addition to limited/reduced staff, the ICR request fell over the Holiday season when (b) (6)

(b) (6)

I'm sure you are aware the timing of the ICR for Merit and other operators falls within the same time period for reporting annual air emissions inventories, annual greenhouse gas ("GHG") reporting, Sara Title III chemical inventories, air permit compliance certifications, semi-annual monitoring reporting, reporting for Subpart OOOO and various other regulatory related reporting all of which are due in the first quarter of 2017.

Mr. Peter Tsirigotis

January 6, 2017

Page 2

In addition to requesting the extension of the deadline for Merit's response to the ICR, Merit requests clarification of the following questions for the Part 1 and Part 2 Surveys:

- *If a Centralized facility receives production from more than 24 "Surface Site IDs" on the Part 1 survey and the spreadsheet isn't allowed to be modified, how should the operator handle the remaining surface sites associated to the Centralized facility?*
- *How should Field Operator Sites be categorized (i.e. by production field, by field office)?*
- *If a Centralized Production Surface Site also has on site a gas compressor that moves natural gas does EPA consider that site a "Gathering and Boosting Compression Facility" instead of a Centralized Production Surface Site? Merit is not certain how to classify those types of sites for the survey.*

Merit appreciates your consideration of its extension request and your clarifications for the above questions. If you have any questions regarding this request please contact me at

(b) (6) @meritenergy.com or at (b) (6) I look forward to hearing from you.

Sincerely,

MERIT ENERGY COMPANY, LLC

(b) (6)

(b) (6)

North Division Regulatory Manager

cc: Ms. Brenda Shine
via email shine.brenda@epa.gov

Cimarex Energy Co.
202 S. Cheyenne Ave.
Suite 1000
Tulsa, Oklahoma 74103-4346
PHONE 918.560.7257
FAX 539.777.0501

CAR-17-000-4300

pa

sent the
1-11-17

Stuart Wittenbach
ES&H Director



Certified Mail (9414 81020088 2268 2634 28)

RECEIVED JAN 13 2017

January 5, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Information Collection Request – Part 2, CAA §114** Request for Extension

Dear Ms. Shine:

Cimarex Energy Co. (Cimarex) received the **Part 2 Information Collection Request (ICR)** for Oil and Gas Production Facilities on December 8, 2016, and for Gathering and Boosting Facilities on December 12, 2016. Cimarex is kindly requesting these be submitted concurrently and an extension of 90 days be granted, having the deadline for submittal be September 8, 2017.

The law supports providing a 90-day extension of the deadline for responding to the Part 2 Operator Survey. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case – § 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator *may reasonably* require” – requires EPA to set reasonable deadlines.

The Part 2 Operator Survey asks for detailed information and sample collection and processing for the selected facilities. The completion of the Part 2 survey will take effort and collaboration from different region operations and departments within Cimarex, in addition to working with consulting groups and third party laboratory services that could have potential delays. This process will require substantial time and resources, and a thorough QA/QC of the data will be necessary to verify its accuracy and compile the data into the form requested by the Agency. All of these must be completed whilst completing the Part 1 ICR. The 180-day deadline imposed by the ICR is considered an unreasonable amount of time in which to complete this work.

Notably, EPA is under no legally enforceable deadline for completing the § 111(d) regulation for which this information is being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 90-day extension will not prevent EPA from meeting legal obligations and will not unreasonably delay issuance of the rule.

Should you or members of your staff have any questions or require additional information, please contact me at (918)560-7257 or via email at (b) (6)@cimarex.com.

Ms. Brenda Shine, U.S. EPA

January 5, 2017

Pg. 2 of 2

Sincerely,
Cimarex Energy Co.

(b) (6)



(b) (6)



ES&H Director

cc: Peter Tsirigotis, U.S. EPA Director, Sector Policies and Programs Division. Office of Air Quality
Planning and Standards

Certified Mail (94148102 00793257 5070 51)

Air Quality Library File: AQ-11-01 (ICR Part 2 Extension Request)

1/5/2017

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US EPA - Research Triangle Park
Peter Tsirigotis
109 T.W. Alexander Drive
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PO Box 24300, M/C LS700
Oklahoma City, OK 73124
EnableMidstream.com

January 10, 2017

VIA CERTIFIED MAIL #7015 1660 0000 5921 3295

RECEIVED JAN 13 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: Oil and Gas Information Collection Request
Enable McLeod, LLC (ICR ID 2878000)

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable McLeod, LLC (ICR ID 2878000), received the ICR for the Gathering and Boosting Segment on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

Enable McLeod appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that Enable McLeod and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., Enable McLeod respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable McLeod, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



PO Box 24300, LS700
Oklahoma City, OK 73124

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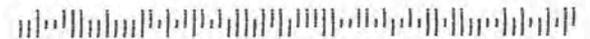


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MS. BRENDA SUINE
U.S. ENVIRONMENTAL PROTECTION
AGENCY
109 T.W. ALEXANDER DRIVE, MAIL
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MS. BRENDA SUINE

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PO Box 24300, M/C LS700
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January 10, 2017

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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request
Enable Oklahoma Intrastate Transmission, LLC
Bennington Compressor Station (ICR ID 4005700)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Oklahoma Intrastate Transmission, LLC (EOIT), received the ICR for the Bennington Compressor Station (ICR ID 4005700) as a Transmission Facility on December 19, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 18, 2017.

EOIT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EOIT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EOIT respectfully requests a 45 day extension until August 3, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Oklahoma Intrastate Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709

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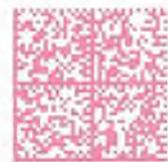
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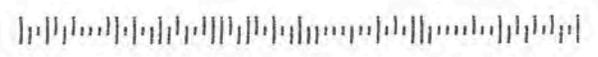
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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request**
Enable Gas Transmission, LLC
Ruston Storage Station (ICR ID 6001150)

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Gas Transmission, LLC (EGT), received the ICR for the Ruston Storage Station (ICR ID 6001150) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EGT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EGT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EGT respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,

Enable Gas Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



PO Box 24300, LS700
Oklahoma City, OK 73124

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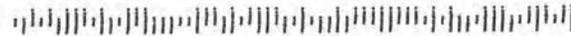
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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request**
Enable Gas Gathering, LLC (ICR ID 2270000)

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Gas Gathering, LLC (EGG) (ICR ID 2270000), received the ICR for the Gathering and Boosting Segment on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EGG appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EGG and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EGG respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6)@enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Gas Gathering, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



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Oklahoma City, OK 73124

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January 10, 2017

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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

Re: **Oil and Gas Information Collection Request
Enable Mississippi River Transmission, LLC
Biggers Compressor Station (ICR ID 4005750)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Mississippi River Transmission, LLC (MRT), received the ICR for the Biggers Compressor Station (ICR ID 4005750) as a Transmission Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

MRT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that MRT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., MRT respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

Please note that the ICR letter was addressed to Enable Gas Transmission, LLC. The Biggers Compressor Station is an asset of Enable Mississippi River Transmission, LLC. This should be corrected in the database upon submittal of the ICR data.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Mississippi River Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



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PO Box 24300, LS700
Oklahoma City, OK 73124

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MS. BRENDA SHINE

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January 10, 2017

VIA CERTIFIED MAIL #7015 1660 0000 5921 3226

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

**Re: Oil and Gas Information Collection Request
Enable Mississippi River Transmission, LLC
St. Jacob Compressor Station (ICR ID 6001170)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Mississippi River Transmission, LLC (MRT), received the ICR for the St. Jacob Compressor Station (ICR ID 6001170) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

MRT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that MRT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., MRT respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Mississippi River Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



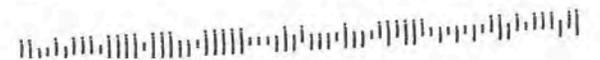
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Oklahoma City, OK 73124

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MS. BRENDA SHINE
U.S. ENVIRONMENTAL PROTECTION
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109 T.W. ALEXANDER DRIVE, MAIL
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P128

Suite 725 • 200 W. Douglas • Wichita, Kansas 67202
(316) 262-3573

RECEIVED JAN 13 2017

January 9, 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: REQUEST FOR EXTENSION OF TIME

Dear Ms. Shine:

Vincent Oil Corporation ("Vincent Oil") received a letter dated November 14, 2016, on or about November 18, 2016 from Peter Tsirigotis pursuant to section 114 of the Clean Air Act. Said letter requested Vincent Oil provide certain information to assist the EPA in developing emission standards through a Survey. Said letter also requested the Survey be completed within 60 days of receipt (the above described letter is hereafter referred to as the "November 14th Letter"). Thus, by Vincent Oil's calculation, the EPA wishes the information be provided on or about February 15, 2017, **assuming the 60 days are business days.**

Vincent Oil has reviewed the Survey and much of the information requested is not readily available. For example, Vincent Oil does not have the locations of some of its facilities recorded via latitude and longitude and would need to have field personnel either obtain or verify location data on a per site basis. This is simply one example, Vincent Oil will require time to obtain several other portions of the survey that are either not tracked by Vincent Oil's current filing systems or are maintained in a variety of separate filing systems. Vincent Oil is a small company whose employment has been reduced recently due to current economic difficulty within the industry as well as (b) (6)

(b) (6)

REQUEST FOR EXTENTION OF TIME
Vincent Oil Corporation
January 9, 2017

Further, Vincent Oil is unclear whether the information it will/could provide will be relevant to the Survey. Due to the above mentioned economic difficulties, Vincent Oil has only completed (b) (4) wells after the September 18, 2015 effective date of regulation 40 CFR 60.5397a Subpart OOOOa, which seems to Vincent Oil to be an important factor upon review of the Survey.

In any event, should the EPA still value the information Vincent Oil would/could provide in the Survey considering the above, Vincent Oil will require more time. As such, Vincent Oil formally requests an additional (90) business days be added to the timeline requested by the November 14th Letter.

As Vincent Oil is unfamiliar with the Survey and it's related requirement, please provide any clarification or additional information that could change Vincent Oil's assumptions above. We look forward to your response. Contact via e-mail may be made at (b) (6) @vincentoil.com and Vincent Oil welcomes correspondence via that medium.

Sincerely,

(b) (6)

Secretary and Vice President

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Wichita, Kansas 67202

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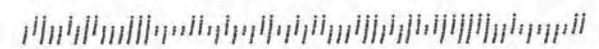
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ZIP 67202
011D11639378

U.S.Environmental Protection Agency
Attention: Ms. Brenda Shine
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





12273 County Road 1560
Ada, OK 74820
Ph: (580) 332-2243
Fax: (580) 798-4457

0AR-17-000-4342

P1+2

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1/2/2017

Attention: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Regarding: ICR Request
Purpose: Request for Extension Part 1 & 2
Facility ID: 1108000
e-GGRT code: ND3Q-IFAG

Dear Brenda,

Cantrell Energy would like to request a 60 day extension to file both part 1 and part 2 of the EPA - ICR survey request. I am a very small operator and have (b) (6) compliance personnel. Also, I (b) (6) (b) (6) and am very concerned with correctly completing the forms.

However, I am very committed to compliance. I am planning on attending an instructional course for ICR on January 11, 2017. Also, (b) (4) (b) (4)

I know you must be very busy with this issue. I apologize for adding any additional strain to your workload. Thank you for your consideration.

Sincerely,

(b) (6)

Blake Cantrell
President
Cell Phone #: (b) (6)
Email: (b) (6)@aol.com

CANTRELL ENERGY
12273 COUNTY ROAD 1560
ADA, OK 74820

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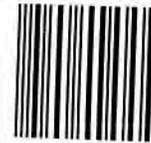


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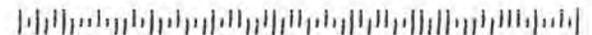
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Ms. Brenda Shing
U.S. Environmental Protection Agency
109 T.W. Alexander Dr
Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





BAYSWATER
EXPLORATION & PRODUCTION, LLC

OAR-17-000-4343

P 1+g

January 5, 2017

RECEIVED JAN 13 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander, Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
shine.brenda@epa.gov

Re: Petition for Extension of Submittal Deadline for EPA's Part 1 and Part 2 Information Collection Request

Dear Ms. Shine:

Bayswater Exploration & Production, LLC ("Bayswater") requests a 60-day extension to complete Part 1 of the Information Collection Request (ICR), received by Bayswater on December 13, 2016. If EPA approves this extension, Bayswater will submit its response to Part 1 of the ICR on or before April 12, 2017. Bayswater also requests a 90-day extension to reply to both sections of Part 2 of the ICR, which it received in two separate mailings; if EPA approves this extension, Bayswater will submit its responses to Part 2 (Production Well Facilities) on or before September 9, 2017 and Part 2 (Gathering and Boosting Facilities) on or before September 4, 2017.

As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide the sought-after information. Bayswater operates over (b) wells and approximately (b) tank batteries. The Part 1 survey requires that we provide data for each well and its corresponding tank battery. The level of effort that will be necessary to respond to the ICR will be extensive and will require a significant amount of time to complete. In addition, the timing of receipt of the ICR fell right at the beginning of the holiday season, a time when Bayswater encourages its employees to spend time with their families. As such, Bayswater's relevant personnel will not have the opportunity to start this process until well into January 2017.

Additionally, Bayswater will be required to work with a contractor/laboratory to conduct the pressurized sampling required by Part 2. The level of detail requested is immense and due to the fact that we will need to visit the Part 2 facilities and coordinate a contractor/laboratory to sample and analyze oil and water samples, additional time is warranted. Bayswater will also be required to conduct a significant level of internal and legal review to identify any Confidential Business Information included in the responsive data and information and to support such claims accordingly. We will also be working on a number of other federal and state annual reporting tasks at the same time, including, for example, EPA's SARA Tier II reporting, GHG Reporting, NSPS OOOO assessments, and Colorado's Regulation No. 7 reporting under Section XII

(monthly control downtime reports and semi-annual submittal) and Section XVII (STEM/LDAR Inspections and annual LDAR Report).

The law supports providing the 60-day and 90-day extensions of the deadline for responding to Parts 1 and 2, respectively. The Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case—§ 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator may reasonably require”—requires EPA to set reasonable deadlines.

Notably, EPA is under no legally enforceable deadline to promulgate the § 111(d) regulation for which this information is ostensibly being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 60-day and 90-day extension will not prevent EPA from meeting any legal obligations, will not unreasonably delay issuance of the rule, and will allow Bayswater to collect all the requested information in the time allowed.

Bayswater appreciates your consideration of its petition for extension to respond to Part 1 and Part 2 of the ICR. Please feel free to contact me if you have any questions or need more information at (303) 893-2503

(b) (5)

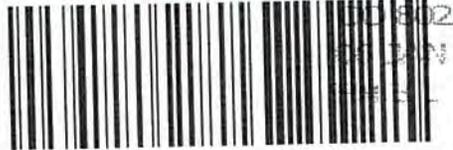
A large black rectangular redaction box covers the majority of the text in this section. The text "(b) (5)" is printed in red at the top left corner of the redacted area.

Environmental Specialist
Bayswater Exploration & Production, LLC



BAYSWATER
 EXPLORATION & PRODUCTION, LLC
 730 17TH STREET, SUITE 610
 DENVER, COLORADO 80202

CERTIFIED MAIL®



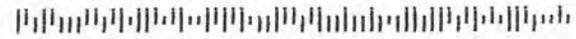
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27709-000209





HURD ENTERPRISES, LTD.

OAL-17-000-4344

P141

RECEIVED JAN 13 2017

January 10, 2017

United States Environmental Protection Agency
Washington DC 20460

RE: Section 114 Letter received December 8, 2016

To Whom It May Concern:

We request an extension of time to comply with the EPA's request as described in the Section 114 correspondence dated November 14, 2016 and received by Hurd Enterprises on December 8, 2016, to provide information related to our oil gas properties. The reason an extension is required is due to the personnel needed to gather and compile the information requested.

Hurd Enterprises is currently (b) (4)

(b) (4) This is hampering our efforts to comply with this request in a timely manner as we engage (b) (4)

Based on the date the letter was received by Hurd Enterprises, the original due date would be February 6, 2017. We formally request a 60-day extension of time to supply the information requested in the Section 114 letter resulting in a revised due date of April 7, 2017.

Thank you for your consideration.

Very truly yours,

Hurd Enterprises, Ltd.
By its General Partner, Hurdco, Inc.

(b) (6)

E. Eugene Garcia, President



HURD ENTERPRISES, LTD.

OAL-17-000-4344

P141

RECEIVED JAN 13 2017

January 10, 2017

United States Environmental Protection Agency
Washington DC 20460

RE: Section 114 Letter received December 8, 2016

To Whom It May Concern:

We request an extension of time to comply with the EPA's request as described in the Section 114 correspondence dated November 14, 2016 and received by Hurd Enterprises on December 8, 2016, to provide information related to our oil gas properties. The reason an extension is required is due to the personnel needed to gather and compile the information requested.

Hurd Enterprises is currently (b) (4)

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(b) (4)

Based on the date the letter was received by Hurd Enterprises, the original due date would be February 6, 2017. We formally request a 60-day extension of time to supply the information requested in the Section 114 letter resulting in a revised due date of April 7, 2017.

Thank you for your consideration.

Very truly yours,

Hurd Enterprises, Ltd.
By its General Partner, Hurdco, Inc.

(b) (6)

E. Eugene Garcia, President



7373 BROADWAY, SUITE 200
SAN ANTONIO, TX 78209

CERTIFIED MAIL



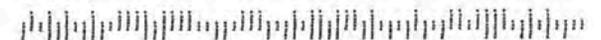
7016 2070 0000 0939 6220

SAN ANTONIO
TX 7820
10 10 2017
PM 4:2



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





OAR-17-000-4361
PI

PO Box 24300, M/C LS700
Oklahoma City, OK 73124
EnableMidstream.com

January 10, 2017

VIA CERTIFIED MAIL #7015 1660 0000 5921 3219

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 17 2017

**Re: Oil and Gas Information Collection Request
Enable Products, LLC
Wetumka Gas Processing Plant (ICR ID 6001180)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Products, LLC (EP), received the ICR for the Wetumka Gas Processing Plant (ICR ID 6001180) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EP appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EP and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EP respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6)@enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Products, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL



7015 1660 0000 5921 3219

ITNERS

PO Box 24300, LS700
Oklahoma City, OK 73124

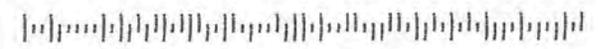
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MS. BRENDA SHINE
U.S. ENVIRONMENTAL PROTECTION
AGENCY
109 T.W. ALEXANDER DRIVE, MAIL
CODE: E143-01
RESEARCH TRIANGLE PARK, NC 27709

27709-031099



Killam Oil Co., Ltd.

OAR-17-000-4356

P1

4320 University Blvd.
P.O. Box 499
Laredo, Texas 78042

Phone 956.724-7141
Fax 956.724-2005
E-mail (b) (6) @killamco.com

January 10, 2017

VIA CERTIFIED MAIL
7015 0640 0001 6047 8315

RECEIVED JAN 17 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1360300, Killam Oil Co., Ltd ("Killam")

Dear Mr. Tsirigotis:

On December 9, 2016, Killam Oil Co., Ltd ("Killam"), received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, Killam respectfully requests an extension of 60 days to respond to the information collection request ("ICR")!

As a result of market conditions, Killam has reduced office staff and field personnel who are responsible for operating and collecting information on approximately over (b) (6) wells and related facilities spread out all over South Texas. Much of the information is not readily available and will require staff to personally visit each site. As you know, this information collection requires Killam to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects Killam to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season (b) (6). Additionally, it is unclear to Killam, how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

Please contact me if you have any questions and I look forward to hearing from you concerning our request for additional time to respond. Please include (b) (6) @killamco.com on any email response to this letter.

(b) (6)

(b) (6)

Land Manager

cc: Ms. Brenda Shire

Killam Oil Co., LTD.
[REDACTED]
Laredo, Texas 78042-0499

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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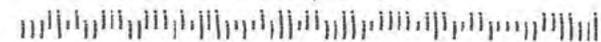
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MS. BRENDA SHIME
OFFICE OF AIR QUALITY PLANNING & STANDARDS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
109 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

2770930310 R777





8528 North Frontage Road
Bridgeport, IL 62417
Phone: 618-943-8700
Fax: 618-943-4501

OP-17-007-4358

P1

1-13-17

RE: Request for an extension for Facility ID 1116900
for Section 114 of the Clean Air Act reporting.

RECEIVED JAN 17 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Ms. Shine,

CDG Operations respectfully requests an extension per the reporting requirements of the ICR. While we understand the importance of having accurate information, we feel unable to meet the very short timeline dictated by the ICR. CDG Operations only recently acquired its assets in and has only controlled operations since August of 2016. As such, CDG does not have the history or resources to file accurate information by the requested date given the high number of wellbores recently acquired. We are therefore formally requesting a 60 day extension to the filing deadline. We greatly appreciate your consideration and understanding regarding this matter and look forward to your response. Please contact (b) (6) at 618-943-8700 or by email at (b) (6) @cdgops.com if you have any questions or require further detail.

Respectfully

(b) (6)

VP, Illinois Basin Operations

January 10, 2017

P1

Peter Tsirigotis
Director, Sector Policies and Programs
Division of Air Quality Planning and Standards
United States Environmental Protection Agency
Washington, D. C. 20460

RECEIVED JAN 17 2017

RE: Information Collection Request (ICR) – Extension Request

Dear Mr. Tsirigotis:

Regarding the letter dated November 14, 2016, received on December 9, 2016, Kriebel Minerals, Inc. (Kriebel) respectfully requests an extension of 60 days to complete Part 1 of the Information Collection Request. Kriebel is a family owned and operated "Conventional" (shallow gas) producer within the Commonwealth of Pennsylvania.

We have approximately (b) (4) wells/facilities that we will need to provide information on, based on our preliminary review of the Part 1 Survey. Due to several factors such as the physical and environmental challenges that impact oil and gas operations in the winter months, the Holiday season, and the demands associated with the annual reporting obligations required by the Pennsylvania Department of Environmental Protection, Kriebel is concerned that it may not be able to meet the required deadline of February 7, 2017. Kriebel understands and appreciates the value of complete and accurate data and wants to ensure that it has adequate time to collect, organize, and present the information to the Environmental Protection Agency, while meeting our existing environmental, safety and health obligations.

Please consider Kriebel's request of an extension of 60 days to complete Part 1 of the Information Collection Request.

Sincerely,

(b) (6)

Kriebel Minerals, Inc.
Production Business Manager

cc: Brenda Shine, United States Environmental Protection Agency

KRIEBEL COMPANIES

633 Mayfield Road
Clarion, Pennsylvania 16214

Developing Resources. Sharing Success.

PITTSBURGH
PA 150
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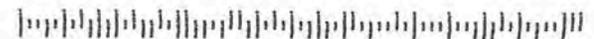


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Brenda Shine
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099





OAR-17-000-4352

P1+2

Caerus Oil & Gas LLC
1001 Seventeenth Street
Suite 1600
Denver, Colorado 80202

RECEIVED JAN 17 2017

December 28, 2016

Brenda Shine
Office of Air Quality Planning and Standards - U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

We recently received an Information Collection Request (ICR), EPA ICR No. 2548.01 for the parent company Caerus Oil and Gas LLC (ICR ID 2114000), as well as for the following asset subsidiaries that fall under the parent company:

- Caerus Piceance LLC (Primary Facility ID 1750000);
- Caerus Northern Rockies LLC (Primary Facility ID 1103500);
- Caerus Southern Rockies LLC (Primary Facility ID 1103600);
- Caerus WashCo LLC (Primary Facility ID 1103650); and
- Caerus Kansas LLC (Primary Facility ID 11034500)

As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request. Please do not hesitate to contact me at (b) (6) if you have any questions or require any additional information.

Sincerely,

CAERUS OIL AND GAS LLC

(b) (6)

(b) (6)

Environmental Health & Safety Engineer



1001 Seventeenth Street
Suite 1600
Denver, Colorado 80202

CERTIFIED MAIL®



7015 0640 0000 9424 5304

80202
01 JAN '17
PM 01



JAN 10 2017

Brenda Shine
Office of Air Quality Planning and Standards-
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460





FCP

Four Corners Petroleum, llc

OAR-17-000-4361

PH2

RECEIVED JAN 18 2017

January 13, 2017

VIA EMAIL AND USPS

Peter Tsirigotis
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
tsirigotis.peter@epa.gov

Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
shine.brenda@epa.gov

RE: Request for Extension: November 14, 2016 Information Collection Request (ICR)
for Facility ID: 1783450

Dear Mr. Tsirigotis and Ms. Shine:

Four Corners Petroleum, LLC ("FCP") is in receipt of an Information Collection Request letter, EPA ICR No. 2548.01 for Facility ID: 1783450, from the U.S. EPA Office of Air Quality Planning and Standards dated November 14, 2016 (the "ICR"). While the ICR is dated November 14, 2016, it was not received by FCP until December 12, 2016 (see attached USPS tracking information). This letter is to request a sixty (60) day extension of FCP's deadline to respond to both Part 1 and Part 2 of the ICR survey request.

FCP requests this extension due to the fact that the ICR was not received until December 12th, and FCP's offices were not open for a portion of the months of December and January due to the national holidays. In addition, in December and January FCP staff are busy with end of year regulatory and internal reporting obligations. Further, as EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail.

This extension is necessary for FCP to fully evaluate the data requested in the ICR and to conduct the detailed reviews necessary to provide information on the requested facilities. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II (both commencing on December 12, 2016), EPA will be giving FCP much-needed time to provide accurate and complete responses to the ICR. Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

Operations Engineer

Enclosure

Four Corners Petroleum, LLC

(b) (6)

Lakewood, CO 80228

303.731.0073 (main)

720.287.3872 (fax)

www.fcpetroleum.com

RECEIVED MAIL DEVISION



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



8 05 0

November 14, 2016

Owner/Operator
FOUR CORNERS PETROLEUM LLC
390 Union Blvd Ste 630
Lakewood, CO 80228-1557

467

9214 8969 0099 9790 1735 7623 21
12 8292 5821 0626 6600 6968 4126





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Tracking Number: 92148969009997901735762321

Expected Delivery Day: Monday, December 12, 2016

Product & Tracking Information

Postal Product:
First-Class Mail®

Features:
Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
December 12, 2016 , 2:41 pm	Delivered, Left with Individual	DENVER, CO 80228

Your item was delivered to an individual at the address 412 S Jamboree Dr, Denver, CO 80228.

December 11, 2016 , 12:47 pm	Departed USPS Destination Facility	DENVER, CO 80266
December 10, 2016 , 8:17 pm	Arrived at USPS Destination Facility	DENVER, CO 80266
December 9, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 9, 2016 , 7:26 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 9, 2016 , 6:11 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
December 7, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

[Return Receipt Electronic](#)

[Text Updates](#)

[Email Updates](#)

Track Another Package

Tracking (or receipt) number

[Track It](#)

Manage Incoming Packages

Track all your packages from a dashboard. No tracking numbers necessary.

[Sign up for My USPS ›](#)





FCP
Four Corners Petroleum, llc

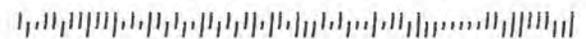
390 Union Blvd, Suite 630
Lakewood, CO 80228

DENVER
CO 802
13 JAN '17
PM 5 L



Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



0AR 17-000-4397



0142

RECEIVED JAN 19 2017

January 4, 2017

via email
and Certified Mail - Return Receipt Requested

7016 0910 0001 3019 7869

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

**RE: REQUEST FOR EXTENSION OF TIME TO RESPOND TO THE OIL AND
NATURAL GAS SECTOR ICR
FACILITY ID 1385600**

Dear Mr. Tsirigotis:

On or about December 19, 2016, the E.P.A. letter dated November 14, 2016 was delivered to the front desk reception area of our office building and left with a person not a part of our company. Unfortunately, the date of delivery was not recorded. The letter was not delivered to me until December 20, 2016. We do not know the exact date of delivery in order to calculate the due date for your ICR.

This letter will serve as a formal request for an extension of sixty (60) days to respond to the ICR., Part I and Part II.

LexGas, Inc. is a very small company owned (b) (6) LexGas, Inc. has (b) (4) to assist in the massive information collection. Like many other operators, for the past year, LexGas, Inc. has been operating (b) (4) to low commodity pricing and (b) (4) (b) (4)

The ICR will require me personally to certify the accuracy of the information provided to the E.P.A. and subjects me personally to criminal liability. Therefore, I will be required to personally travel approximately (b) (4) miles daily from our office to each site, because I cannot delegate to someone else. Your letter specifically indicates how vital it is for you to obtain the very best information; however, your restrictive deadline is the biggest impediment to receiving it. This

99 Trophy Club Drive
Trophy Club, Texas 76262
(817) 430-4162

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
January 4, 2017
Page 2

extension is absolutely necessary for me to conduct the detailed review to provide information on requested facilities.

Additionally, there are portions of the Part I Survey that I cannot understand and/or calculate. How do I determine date of delivery of E.P.A. letter? How do I determine due date of ICR? All of our gas/oil wells are produced for "sales". The questions in Section 3 and 4 are confusing and I cannot answer. Is the "Surface Site ID" asked for in Section 3 and 4 the same as the "Facility ID" provided in the November 14, 2016 letter? Please explain the calculation and reasoning for the excessive penalty (\$93,750 per day) for non-compliance. What person(s) are authorized to determine "non-compliance"? Please provide precise regulatory authority for such penalty and non-compliance authority. What appeals process is available?

We agree that the anticipated cost and burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Please advise as to the extension request and, if possible, provide clarification and answers to the questions indicated above.

Thank you for your courtesy and cooperating in this matter.

Yours very truly,
LexGas, Inc.

(b) (6)
By _____
George S. Gafford, II, President

GSG/ghg

cc: Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460



OAR-17-000-4401

162

Jeems Bayou Production Corporation

January 11, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 19 2017

**RE: REQUEST FOR EXTENSION OF TIME TO RESPOND
TO THE OIL AND NATURAL GAS SECTOR ICR**

FACILITY ID #: 1336800

Dear Mr. Tsirigotis:

On or about December 15, 2016, we received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, we respectfully called your office to request an extension of time in which to respond to this information collection request. We spoke with Ms. Angie Carey of your office to explain our position concerning this ICR. She verbally agreed to grant an extension of 30 more days for our response. We are very appreciative of such extension but would additionally request that this extension be increased to a 60-day extension for the following reasons.

As a result of market conditions, we have trimmed our staff to only (b) (4) people who have the responsibility for collection of all information for three states in which we operate. This includes all production reporting requirements for Arkansas, Texas and Louisiana as well as accounting functions within the company, not the least of which includes joint interest billings; accounts payable and receivable; payroll reporting to three states; payroll maintenance; revenue reporting; etc.

With the new requirements from the IRS for the W2 and 1099 changes in reporting date, we have faced the unenviable task of attempting to comply with this as well. We are a small independent oil and gas operator who is diligently trying to comply with all federal and state regulations in order to continue operating; however, in the fiscal year ending September 30, 2015, as a company we lost over (b) (4) and will (b) (4). Consequently, additional burdens such as this reporting requirement make it more onerous to continue operating. (b) (4)

(b) (4)

Main Office
P.O. Box 639 Oil City, Louisiana 71061
(318) 221-4410 (318) 995-7184

Land, Geological & Engineering Office
212 Texas, Ste. 201 Shreveport, Louisiana 71101
(318) 227-2219

Mr. Peter Tsirigotis, Director

Page 2

January 11, 2017

We are currently attempting to gather all information regarding the ICR Part 1 Survey. We are unclear about the Part 2 survey and would like additional time in which to study same. We have (b) (4) (b) (4) on staff and will likely have to seek outside direction for completing Part 2. Therefore, we respectfully request an additional 60 days' time for completion of this part as well.

Sincerely,

(b) (6)

(b) (6)

/mw

CERTIFIED MAIL™



7012 1640 0001 1409 1737



Jeems Bayou Production Corporation
Main Office
P.O. Box 639
Oil City, Louisiana 71061

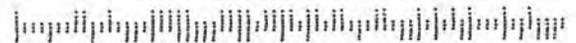


MR. PETER TSIRIGOTIS
DIRECTOR, SECTOR POLICIES AND PROGRAMS DIVISION
OFFICE OF AIR QUALITY PLANNING AND STANDARDS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
109 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

SHREVEPORT
LA 710
11 JAN '17
PM 2 L



27709-031099



OAR-17-000-4407
P142



BREITBURN OPERATING LP
707 Wilshire Boulevard, 46th Floor
Los Angeles, California 90017
t 213.225.5900 f 213.225.5916

RECEIVED JAN 19 2017

Via Email (Tsirigotis.peter@Epa.gov)
and Courier

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension of Deadline to Respond to Information Collection
Request of U.S. Environmental Protection Agency concerning Emission
Standards for Oil and Gas Facilities (ICR)

Dear Mr. Tsirigotis,

Reference is made to the 16 ICR letters that have been received by our various offices during the month of December, the latest of which was received on December 15, 2016. For the reasons set forth herein, we respectfully request the following: (i) that Breitburn Operating LP (Breitburn Operating) be assigned one individual Operator ICR ID for its various operations and facilities; (ii) that Breitburn Operating be granted a 90-day extension for responding to Part 1 of the ICR for all its applicable operations (i.e., through May 15, 2017); and (iii) that Breitburn Operating be granted a 90-day extension for responding to Part 2 of the ICR for all its applicable facilities (i.e., through September 11, 2017).

Background

Breitburn Operating LP (Breitburn Operating) is a wholly owned subsidiary of Breitburn Energy Partners LP (Breitburn MLP). Breitburn MLP became a publicly traded master limited partnership in October 2006, and Breitburn Operating is the primary operating company for all of Breitburn MLP's assets. In November 2014, Breitburn MLP completed a merger whereby it acquired QR Energy, LP.

Breitburn MLP's producing and non-producing crude oil and natural gas reserves are located in Ark-La-Tex; the Midwest; the Permian Basin; the Mid-Continent; the Rockies; the Southeast; and California. In May 2016, Breitburn MLP, and certain of its wholly owned subsidiaries including Breitburn Operating, filed voluntary petitions for relief under Chapter 11

of the U.S. Bankruptcy Code. Since then, Breitburn Operating has continued operating all of Breitburn MLP's producing and non-producing crude oil and natural gas reserves.

The Assignment of Numerous IDs to Similar/Same and Non-Breitburn Entities Results in Duplicative Data Gathering Leading to Redundant and Confusing Data Compilation in the Future

As mentioned above, 16 ICR letters have been mailed to and received in various Breitburn offices throughout the country. A list of the letters is attached hereto as Attachment 1.

As reflected on Attachment 1, 16 different "Facility ICR ID" numbers with 16 unique invitation codes have been assigned to various Breitburn MLP entities. Based on the "Instructions for the Oil and Gas Information Collection Request," operators with more than 50 field operator sites should contact U.S. EPA "to get additional Facility ID assignments" but at this point, with 16 different letters, Breitburn Operating is unable to do so until it is assigned a "unique Operator ICR ID."

In addition, while several of the companies listed in Attachment 1 appear to be variations of the same (e.g., Breitburn Operating, LP and Breitburn Operating Limited Partnership) and another company (e.g., Breitburn Management Company) is a different but still wholly owned affiliate of Breitburn MLP, each of the foregoing has been assigned a separate ID.

Finally, several of the letters are addressed to entities that are not subsidiaries of Breitburn MLP, nor have they ever been subsidiaries of Breitburn MLP. The names of those entities are set forth below:

Quantum Resources Management LLC
Quantum Resources Management, LLC
Breitburn Energy Company LLC
Breitburn Energy Co LP

Presumably, the two Quantum-named entities are affiliated with the former QR Energy, LP but neither of those entities was included in the Breitburn – QR Energy merger which was completed in November 2014. The two Breitburn-named entities are predecessor name(s) for a company we believe is currently named Pacific Coast Energy Company LP – Pacific Coast is not a subsidiary of Breitburn MLP or Breitburn Operating.

In light of the foregoing, Breitburn Operating respectfully requests that it be assigned one individual Operator ICR ID for its various facilities so that it may successfully use the U.S. EPA's proposed incremental sequencing system applicable to instances involving more than 50 field operator sites. Doing so will avoid duplication of effort in compiling the data and future duplication (and thereby confusion) in the tabulation of the data ultimately submitted by Breitburn Operating.

Breitburn Operating Does Not Have Sufficient Personnel to Responsibly Comply with the ICR Without an Extension

As of December 31, 2015, Breitburn MLP had more than (b) (4) net) oil and gas production wells in seven different operating areas across 14 different states. In addition, Breitburn MLP had more than (b) (4) (gross) leasehold acres of developed and undeveloped acreage.

Breitburn MLP, like much of the oil and gas industry, has been significantly and adversely affected as a result of the prolonged downturn in crude oil prices that has been ongoing since at least November 2014 (if not earlier). As a result of the downturn, Breitburn MLP has, among other things, reduced personnel on more than one occasion. Since the end of 2014, Breitburn MLP has lost (b) (4) of its work force and ended 2016 with approximately (b) employees. Despite such reductions (and many other efforts), Breitburn MLP, and certain of its subsidiaries, ultimately filed for protection under Chapter 11 of the U.S. Bankruptcy Code in May 2016.

Notwithstanding its reduced staff, Breitburn Operating's EHS team faces – and continues to meet – a myriad of daily, weekly, monthly, quarterly and annual reporting obligations at the federal, state and local levels. These obligations have increased significantly in recent years. The most onerous reporting obligations occur during the first quarter – the exact same time frame currently contemplated for complying with the EPA's recent ICR. By way of example, set forth below are select lists (but certainly not exhaustive lists) of reporting obligations handled by Breitburn Operating's EHS team – the same team responsible for responding to EPA's ICR.

Annual Reports Due During First Quarter

- EPA Greenhouse Gas Inventory Calculation and Reporting
- California Air Resources Board Annual Greenhouse Gas Mandatory Inventory Reporting
- Air Emission Calculation and Reporting
- Annual Certification of Title V Air Permits
- DOT/PHMSA Natural Gas Transmission and Gathering Systems Reports
- DOT/PHMSA Liquids Transmission and Gathering Systems Reports
- Water Use Reports
- SARA Title III, Tier II Emergency and Hazardous Chemical Reports
- California Hazardous Material Business Emergency Plan Certification and Chemical Inventory
- California Board of Equalization Hazardous Waste Generator and Environmental Fee
- UIC Injection Well Reports

Select Additional Routine (i.e., Monthly/Quarterly) Reporting Obligations

- Emission testing and reporting
- Subpart KKK monitoring and reporting
- Subparts OOOO, HH, and ZZZZ monitoring and reporting
- Develop Subpart OOOOa fugitive emissions monitoring plan
- Monthly Sundry Reports (Pursuant to BLM New Rule: Waste Prevention, Production Subject to Royalties and Resource Conservation)
- Quarterly air permit reporting
- Groundwater monitoring reports
- SPCC inspections and plan review
- UIC injection well volume/pressure reports
- Monthly NPDES reporting
- Secondary containment monitoring reports
- Title V Semi-annual Reports
- LDAR reports for all components, wells & water handling equipment; NOX emission reports and certifications; stationary engine reports; and Industrial Waste Discharge Self-Monitoring and Benzene Reports (California)

In light of the foregoing, the only responsible way for Breitburn Operating to complete Part 1 and Part 2 of the ICR in accordance with EPA's proposed deadlines would be to incur significant additional costs and hire third-parties to assist in the effort. Unfortunately, and based on past experience, asking advisors unfamiliar with our operations to complete a task in a compressed time period rarely produces good or even adequate results and generally has not proven to be the most efficient path forward. In addition, the incurrence of such costs would be subject to scrutiny as a result of the ongoing Chapter 11 restructuring process.

Part 2 of the ICR Warrants An Extension Due to Similar Clarification Issues and A Limited Number of Independent Testing Alternatives

As outlined above, we have received 16 ICR letters leading to significant amounts of duplication and/or confusion. In addition, Part 2 of the letters are vague as they relate to various facilities. Not only do the corporate entity issues outlined above need to be resolved, Breitburn Operating requires additional facility information such as site location, mailing address, and/or other identifiers such as air permit numbers to identify and categorize potentially responsive facilities before it can begin addressing Part 2 of the ICR.

Some of the Part 2 requirements may also be impossible to complete in the time frame initially proposed by EPA. For example, Item 4 of the Detailed Facility Survey form covers "Tanks and Separators" and requires operators to provide pressurized liquid samples pursuant to GPA Method 2103 for thousands of well/tank facilities. Since there are a limited number of independent laboratories in the country that can perform such tests, operators being asked to complete Part 2 are potentially facing an insurmountable bottleneck once they, including

Breitburn Operating, overwhelm the qualified labs with similar requests to perform Part 2 testing requirements.

Conclusion

Breitburn Operating stands ready, willing and able to comply with the EPA's ICR. However, in light of the issues set forth herein, it would be unreasonable (and unrealistic) for existing Breitburn Operating personnel to collect and report responsibly the data requested for both Part 1 and Part 2 in the initial 60-day and 180-day periods, respectively, proposed by the EPA. For the reasons set forth herein, we respectfully request that: (i) Breitburn Operating be granted a 90-day extension through May 15, 2017, for responding to Part 1 of the ICR for all its applicable operations, and (ii) that Breitburn Operating be granted a 90-day extension through September 11, 2017 for responding to Part 2 of the ICR for all its applicable facilities. In addition to the foregoing, we respectfully request that EPA work with Breitburn Operating to assign one individual Operator ICR ID for its various facilities.

Thank you in advance for your prompt and positive response to our request. Please do not hesitate to contact the undersigned at (b) (6) if you have any questions concerning any of the matters set forth in this letter.

Very truly yours,

(b) (6)

(b) (6)

Vice President, Government Affairs

cc:

U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
Attn: Ms. Brenda Shine (shine.brenda@epa.gov)

Attachment I
to
Breitburn Operating LP Letter dated January , 2017

Company Name	Assigned ID#	Invitation	Letter Number	Addressee
Breitburn Energy Partners LP	1084550	953H-8TIL	7237	(b) (6)
Breitburn Energy Partners LP	1084600	BEFI-VWFK	5037	
Breitburn Energy Partners LP	5001250	WGCH-V7XP	7247	
Breitburn Energy Partners LP	2102000	S5DI-FCWI	7245	
Breitburn Operating Limited Partnership	1084650	6200-LDX7	5184	
Quantum Resources Management, LLC	1532000	SBXM-1LNF	9578	
Breitburn Energy Company LLC	1084450	S8DU-CW5R	9475	
Breitburn Energy Company LLC	1084400	ESTK-VAYH	9474	
Breitburn Energy Co LP	2099000	AZZO-4ML1	9622	
Breitburn Management Company	2101000	G5UZ-RNZ7	5186	
Breitburn Energy Partners LP	3001180	TVDJ-W3EO	5834	
Breitburn Energy Partners LP	2100000	PQJI-NB2P	5833	
Quantum Resources Management LLC	2640000	QCHC-RPOK	9652	
Quantum Resources Management LLC	3007000	ZYX8-D5EO	533	
Breitburn Operating, LP	2103000	GPXC-ZJLE	10134	
Breitburn Operating, LP	2103000	GPXC-ZJLE	409	

OAR-17-000-4266

P115

Cordele Development Corporation

314 E. Commerce Street, Suite #400
San Antonio, Texas 78205
Phone (210) 223-5564
Fax (210) 223-9050

Lisa Thompson
called 1/5

December 20, 2016

Certified Mail: #7014 0510 0001 4258 9955

RECEIVED JAN 5 / 2017

United States Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, NC 27709

Re: Primary Facility ID #1148500

Dear Ms. Shine,

We are in receipt of your certified letter dated November 14, 2016, which we received on December 9, 2016, concerning climate change from the Obama Administration.

We are requesting an extension of an **additional 180 days** to complete both Part 1 and **Part 2** of the paperwork because we believe that we may be exempt.

Very truly yours,

(b) (6)

(b) (6)

Cordele Development Corporation

KG/stw

Cordele Development Corporation
314 E. Commerce Street, Suite #400
San Antonio, Texas 78205

CERTIFIED MAIL™



7014 0510 0001 4258 9955

U. S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Dr.
Mail Code: E143-01
Research Triangle Park, NC 27709



27709-031099



OAR 17-000-4272

PKJ



Lisa Thompson
left vm 1/5

December 21, 2016

RECEIVED JAN 5 / 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: ICR - Request for Extension

Facility ID 1006200 ABARTA Oil & Gas, Inc

Facility ID 2002000 ABARTA Inc

Facility ID 3000030 Ken Fleeman, ABARTA Oil & Gas Company

Dear Mr. Tsirigotis,

ABARTA Oil & Gas Co., Inc. respectfully requests a 60 day extension of the submittal deadline for the above referenced facility IDs for both Part 1 and Part 2. Despite preliminary inventory preparation, the scope and timing present a significant burden on (b) (4)

Our current regulatory workload includes the annual GHG report and annual UIC injection report to the EPA, annual air emission inventory and well mechanical integrity report in Pennsylvania, Sarah Title 3, Tier II hazardous chemical inventory, annual DOT pipeline report, year-end production and waste reporting due in three states and an air permit renewal for a facility in Kentucky.

Other year-end responsibilities include natural gas and oil reserve report preparation for over (b) (4) wells in which we own an interest. We also have internal obligations to the fiscal close and external financial audit. ABARTA's entire staff is saturated having been reduced by (b) (4) due to poor natural gas and crude oil pricing. ABARTA will make its best effort to comply, however an extension would be greatly appreciated.

Regards,

(b) (6)

(b) (6)

Manager of Engineering

KEN/tgm

Cc: Ms. Brenda Shine



OAR-17-0004273

PLA

Lisa Thompson
left vm 1/5

National Fuel Corporation

P.O. Box 4892

Parker, CO 80134

(303) 220-7772 Phone (303) 220-7773 Fax

December 19, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

We recently received an Information Collection Request (ICR), EPA ICR No. 2548.01. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. Our operations are especially remote and subject to harsh winter conditions that would put our staff at personal safety risk. Therefore, in order to provide EPA with the most accurate possible information, we respectfully request **a 120-day extension for both Parts I and II.** This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 180 days to respond to Part I and 300 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

National Fuel Corporation

(b) (6)

✓ cc: Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

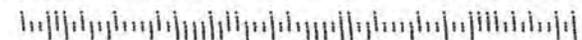
NATIONAL FUEL CORPORATION
P.O. BOX 4892
PARKER, CO 80134

DENVER
CO 802
20 DEC 15
PM 7:00



Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, MC: E143-01
Research Triangle Park, NC 27709

27709-031099





OAR-17-000-4075
P1+2

Christopher Boehler
Director of Regulatory Affairs

Lisa Thompson
left vm 1/5

December 13, 2016

RECEIVED JAN 5 / 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

Concho Resources Inc. ("Concho") recently received an Information Collection Request (ICR), EPA ICR No. 2548.01. This request is extraordinary, both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, Concho respectfully requests a **sixty (60) day extension for both Parts I and II**. This extension is absolutely necessary for Concho to conduct the detailed reviews necessary to provide information on the requested facilities.

We expect the anticipated burden of the ICR to be significantly greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing one hundred twenty (120) days to respond to Part I and two hundred forty (240) days to respond to Part II, EPA will be giving Concho much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

CB/kk



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CERTIFIED MAIL

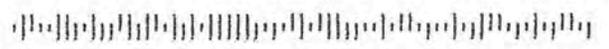


91 7199 9991 7036 0762 4029



Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

RTP/NC
DEC 19 2016



OAR 17-000-4277

Left vm 1/15
- Lisa Thompson

P1 & 2



Whiting Petroleum Corporation
and its wholly owned subsidiary
Whiting Oil and Gas Corporation

1700 Broadway, Suite 2300, Denver, CO 80290-2300
Phone: 303.837.1661 | FAX: 303.861.4023

December 22, 2016

Via FedEx 7780 2566 3230

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Re: Information Collection Effort for Oil and Gas Facilities
Request for Deadline Extension
Whiting Petroleum Corporation

Dear Ms. Shine:

Whiting Petroleum Corporation (Whiting) recently received an Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204 for the following Facility ICR IDs.

- 1717400 (primary Facility ID; Part 1; ICR received December 8, 2016)
- 2853000 (Assigned Facility ID; Part 2; ICR received December 15, 2016)

To enable Whiting to provide the most accurate information possible, Whiting respectfully requests a 60-day deadline extension for both Parts I and II. This extension is necessary for Whiting to gather the extensive information requested and conduct the detailed quality assurance necessary to provide comprehensive and accurate information for the requested facilities.

As Whiting understands the requested information may be used in future rulemaking efforts, EPA benefits by receiving the most accurate and complete information possible. By granting this requested extension to provide Whiting 120 days to respond to Part I and 240 days to respond to Part II, EPA will be providing Whiting the requisite time necessary to provide complete and accurate information for EPA's review and consideration.

These requests, together, require Whiting to gather and review information for (b) (4) of facilities and associated wells. This effort requires substantial time and resources to ensure EPA is provided accurate and complete information. Indeed, EPA admits in the ICR's Fact Sheet that it "seeks a broad range of information." In addition to the effort required to gather the requested information, Whiting must then conduct data and information quality assurance. Following quality assurance efforts, Whiting must compile such data in the format requested

by EPA, as Whiting does not maintain data and information according to EPA's format. Further, information requested in Part 2 of the ICR will require detailed, labor-intensive, site-by-site calculations that will be difficult, if not impossible, to complete accurately within the allotted timeframe. As EPA is aware, this effort is requested to be completed during the end-of-year holidays, when (b) (6)

(b) (6) and also overlaps with, among others, onerous NSPS Subpart 0000 and Mandatory Greenhouse Gas Reporting Rule reporting deadlines. Lastly, Whiting must review all information and data to determine whether disclosure of any such would compromise confidential business information to protect its competitive advantage in the marketplace.

Section 114 provides no limit to the time EPA may provide an owner or operator to respond to an ICR such as this, and thereby provides EPA discretion, of course within reasonable bounds, to set appropriate deadlines. Whiting believes its request for a 60-day extension is reasonable and necessary to respond adequately to the aforementioned ICRs. As EPA will receive a massive collection of information from Industry, Whiting believes granting this requested deadline extension will not affect EPA's timeline for review.

The law supports providing a 60-day deadline extension for responding to the Part I and Part II Operator Surveys. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, EPA relies on §114(a)(1)(G), which authorizes EPA to request "such other information as the Administrator may reasonably require - requires EPA to set reasonable deadlines.

Thank you for your consideration of this request.

Respectfully requested,

(b) (6)

Whiting Petroleum Corporation

(b) (6)

Environmental Attorney

ORIGIN ID:DENA (303) 802-8366
KYLA LIVINGSTON
WHITING OIL & GAS
1700 BROADWAY
SUITE 2300
DENVER, CO 80290
UNITED STATES US

SHIP DATE: 22DEC16
ACTWGT: 0.10 LB
CAD: 104407788/NET3790

BILL SENDER

TO **BRENDA SHINE**
US EPA
1200 PENNSYLVANIA AVENUE, N.W.
28221T
WASHINGTON DC 20460

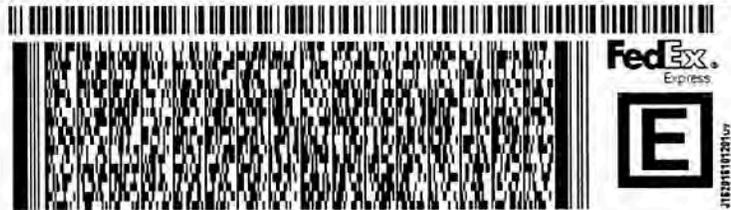
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(555) 555-5555

REF

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PO

DEPT

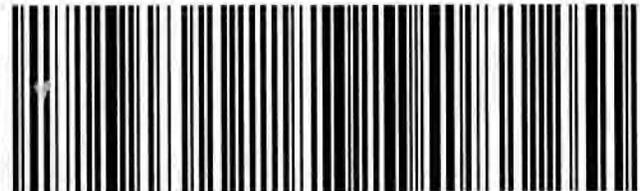


FRI - 23 DEC 3:00P
STANDARD OVERNIGHT

TRK# 7780 2566 3230
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XC RDVA

20460
DC-US IAD



DAE-17-004280

p 1x2

Lisa Thompson 1/5
left vm



December 19, 2016

RECEIVED JAN 5 / 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

We recently received an Information Collection Request (ICR), EPA ICR No. 2548.01. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

TEP Rocky Mountain LLC



P.O. Box 370
1058 CR 215
Parachute, CO 81635

CERTIFIED MAIL™



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GRAND JUNCTION 815

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US POSTAGE

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011D12802430

R.T.P.N.C

US Environmental Protection Agency
Office of Air Quality P&S/Brenda Shine
Mail Code 2822 IT
1200 Pennsylvania Ave NW
Washington, DC 20460

DEC 27 2016



OAR 17-000-4284

PIA



Crescent Point

main / 720.880.3610
fax / 303.292.1562
toll free / 1.888.693.0020
555 17th Street, Suite 1800
Denver, Colorado
USA 80202

December 20, 2016

RECEIVED JAN 5 / 2017

left message 1/5
Lisa Thompson

Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: INFORMATION COLLECTION REQUEST
REQUEST FOR EXTENSION

Dear Mr. Tsirigotis:

We recently received three Information Collection Requests (ICR), EPA ICR No. 2548.01, addressed to Crescent Point Energy U.S. Corp, Legacy Oil & Gas ND Inc, and Corinthian Exploration (USA) Corp. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II for production wells and gathering and boosting compressor station and pipeline facilities, as applicable. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request. Please feel free to contact me at (b) (6) or at (b) (6) @crescentpointenergy.com if you have any questions or require additional information.

Sincerely,

(b) (6)

(b) (6)

Team Lead, Environmental
CRESCENT POINT ENERGY U.S. CORP

cc: Brenda Shine, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

OAR-17-000-4285

P 1/2

NEWFIELD



RECEIVED JAN 5 / 2017

January 4, 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code E143-01
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

Newfield Exploration Company
4 Waterway Square Place | Suite 100
The Woodlands, Texas 77380
PH 281-210-5100 | FAX 281-210-5101

called 1/5
Lise Thompson

RE: Petition for Extension of Submittal Deadlines for Information Collection Request

Dear Ms. Shine:

On December 19th, 2016 Newfield Exploration Company (Newfield) requested a 60-day extension of the respective deadlines for Parts I and II of the Information Collection Request (ICR), EPA ICR No. 2548.01 (see attached).

I ask that any questions or responses concerning this request be directed to me. My contact information is as follows:

(b) (6)

Corporate Air Quality Manager
Newfield Exploration Company
4 Waterway Square Place, Suite 100
The Woodlands, TX 77380

(b) (6)

Sincerely,

(b) (6)

(b) (6)

RECEIVED JAN 5 / 2017



Newfield Exploration Company
Waterway Square Place | Suite 400
The Woodlands, Texas 77380
PH 281-210-5100 | FAX 281-210-5101

December 19, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code E143-01
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Petition for Extension of Submittal Deadlines for Information Collection Request

Dear Ms. Shine:

Newfield Exploration Company (Newfield) requests a 60-day extension of the respective deadlines for Parts I and II of the Information Collection Request (ICR), EPA ICR No. 2548.01. Newfield finds the ICR unprecedented in terms of the breadth and depth of detail it requests. The requested extension is necessary in order to provide EPA with the most accurate information possible.

Newfield is an independent Exploration and Production company headquartered in The Woodlands, Texas with operations in the Anadarko, Uinta and Williston Basins. Despite Newfield's being a small business with fewer than (b) (4) employees, the company currently owns and operates nearly (b) (4) wells. The portfolio of Newfield's assets has changed significantly in recent months due to multiple divestitures and one significant acquisition.

Both Parts I and II require very specific detailed information about wells and equipment owned or operated by Newfield. In fact, EPA admits in the Fact Sheet for the ICR that it "seeks a broad range of information." Many entities pointed out during the rule public comment period that EPA had underestimated the amount of time, effort, and resources required to faithfully complete the ICR.²

Part I asks Newfield to provide data for each well and its corresponding tank battery. This will require substantial time and resources. The Part II survey is incredibly detailed and burdensome. An initial review indicates that Newfield will have to complete a Part II survey for (b) (4) production and (b) (4) gathering and boosting facility and will need to take numerous pressurized samples. This will necessitate significant coordination with each facility and a contractor/laboratory to take and analyze the samples. As every operator required to complete a Part II survey will be hiring contractors to collect samples, Newfield anticipates delays in working with the laboratories. With both parts, Newfield will need to collect data from multiple locations, conduct in-depth QA/QC to validate the information, and

² See, e.g., Western Energy Alliance Comments 2 (Oct. 31, 2016), available at <http://www.regulations.gov>, EPA-HQ-OAR-2016-0204-0180 (noting that industry pilot programs indicate that the labor costs associated with Part I may be three to five times higher than EPA's estimate).

ORIGIN: MEX (b) (6) (281) 210-5261
NEWFIELD EXPLORATION
24 WATERWAY AVENUE
SUITE 900
THE WOODLANDS, TX 77380
UNITED STATES US

SHIP DATE: 04JAN17
ACTWGT: 1.00 LB
CAD: 103208748/NET3790

BILL SENDER

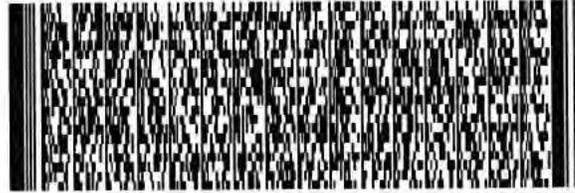
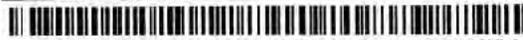
TO **BRENDA SHINE**
US EPA
109 T.W. ALEXANDER DR
MAIL CODE E143-01
RESEARCH TRIANGLE PA NC 27709

(919) 541-2249
INV
PO 950027860

REF DOUG HENDERER

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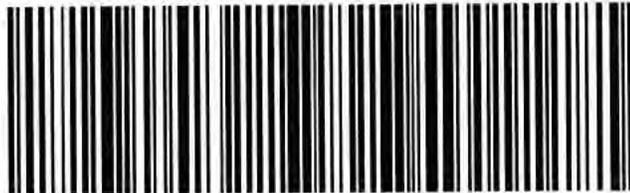
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NC-US RDU



OAR-17-000-4274

P2

enerPLUS

Lisa Thompson
called 1/5

December 12, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

RECEIVED JAN 5 / 2017

Dear Ms. Shine:

On December 9, 2016, Enerplus Resources (USA) Corporation ("Enerplus") received a Part 2 – Detailed Facility Survey Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204. To provide EPA with the most accurate possible information, we respectfully request a 60-day extension for the Part 2 response. This extension is necessary for Enerplus to ensure adequate sampling points exist, pull necessary samples for laboratory analysis and for Enerplus to perform the necessary detailed review and uploading of the most accurate information. The 60-day extension request would set a new Part 2 Enerplus completion deadline for the Part 2 response of August 6, 2017.

Thank you for your consideration of this request. If you should have any questions or require additional detail, please don't hesitate to contact me via email at (b) (6)@enerplus.com or via phone at (b) (6) (b) (6).

Sincerely,

(b) (6)

Lead – Environmental Programs

enerPLUS

ENERPLUS RESOURCES (USA) CORPORATION



Denver, Colorado 80202-2805

CERTIFIED MAIL™



7012 3050 0000 7167 0751



DEC 19 2016

Office of Air Quality Planning & Standards
U.S. Environmental Protection Agency
Mail Code 2822IT, 1200 Pennsylvania Ave N.W
Washington, DC 20460

20480-

|||||
Attn: Brenda Shine



OAP-17-000-4232

1402

sent her 1-11-17

RECEIVED JAN 13 2017

January 6, 2017

Oasis Petroleum
1001 Fannin Street, Suite 1500
Houston, TX 77002

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Request for Extension of EPA Oil and Gas ICR Submission Deadlines

Dear Ms. Shine:

We received three letters regarding EPA Information Collection Request (ICR) No. 2548.01 on December 9, 2016. Based on the receipt date, we are required to submit responses to Part 1 and Part 2 by February 7, 2017 and June 7, 2017, respectively. Oasis Petroleum is committed to providing the most accurate and complete information possible, and to that end we respectfully request a 30-day extension for both Parts 1 and 2 of the ICR, making our proposed submission deadlines March 9, 2017 and July 7, 2017, respectively.

Given the extensive scope of information sought, we are confident that additional response time is absolutely necessary. Much of the requested information will require calculations and determinations drawn from disparate data sources; some information will require detailed, site-specific reviews; and all information will require thorough review prior to submission to ensure accuracy. In addition, practical questions regarding EPA's preferred organization of data, among other preliminary matters, have caused delays as we await further direction. Granting a 30-day extension for both Parts 1 and 2 will allow our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Respectfully,

(b) (6)

(b) (6)

Regulatory Manager
Oasis Petroleum

(b) (6)

Enclosure: Documentation of certified mail receipt of ICR letters

Cc: Peter Tsirigotis, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

Tracking Number: 92148969009997901735384356



Delivered

Product & Tracking Information

Postal Product:
First-Class Mail®

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DATE & TIME	STATUS OF ITEM	LOCATION
December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:56 pm on December 9, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 4:20 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:20 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:24 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:24 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:09 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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MAILED FROM ZIP CODE 27284

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Tracking Number: 92148969009997901735385384



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DATE & TIME	STATUS OF ITEM	LOCATION
December 10, 2016 , 2:23 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:23 pm on December 10, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 11:48 pm	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 9, 2016 , 5:56 am	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:49 pm	In Transit to Destination	
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December 5, 2016 , 8:49 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:34 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS. USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates



Tracking Number: 92148969009997901735385704



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December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:56 pm on December 9, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 4:13 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:21 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:41 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:41 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:26 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates



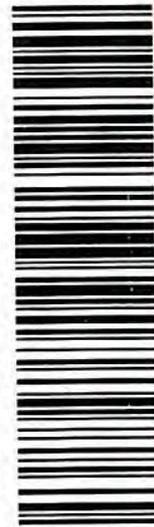


Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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1001 Fannin, Suite 1500
Houston, Texas 77002

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Peter Tsirigotis
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: D205-01
Research Triangle Park, NC 27709



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OAR-17-000-4238

1+2



3

January 6, 2017

RECEIVED JAN 10 2017

Mr. Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

RE: Request for Extension to Respond to the Information Collection Request (ICR) for the Oil & Natural Gas Sector—Part 1 & Part 2

Facility ID 1112400 – Carrizo (Eagle Ford) LLC
Facility ID 1112450 – Carrizo (Marcellus) LLC
Facility ID 1112500 – Carrizo (Permian) LLC
Facility ID 1112550 – Carrizo (Utica) LLC
Facility ID 1112650 – Carrizo (Niobrara) LLC
Facility ID 1112700 – Carrizo Oil & Gas, Inc.

Dear Mr. Tsirigotis:

On December 9, 2016, Carrizo received multiple letters from you dated November 14, 2016, requesting information regarding the above referenced facilities. For the following reasons, Carrizo is respectfully requesting an extension to the 60 days and 180 days required to respond to the ICR Part 1 and Part 2 surveys, respectively.

Carrizo is concerned that the ICR due dates have not taken into consideration multiple federal holidays that fall within the allotted 60 day/180 day turnaround. Additionally, due to the December holidays, limited staff is/have been available to collect, review, and prepare the requested data. Furthermore, the ICR project is concurrent with multiple other state and federal air quality reporting obligations Carrizo must comply with including NSPS OOOO reporting, Annual GHG Subpart W reporting, Annual Emissions Inventories, and Annual Permit Evaluation Reports. Carrizo is diligently working to comply with the ICR requirements, while also balancing the reporting burden of other existing and ongoing environmental, air quality obligations.

In addition to requesting additional time to complete Part 1 and Part 2, Carrizo has concerns on how to handle various elements of the data being collected, which are outlined below:

- What is an acceptable "Surface Site ID"? Many of Carrizo's facilities either have multiple State-issued permits/registration numbers or the facilities are authorized under Exemptions which don't have assigned permit/registration numbers.
- How do we account for gunbarrel tanks in the tank and/or separator category(ies)? At Carrizo, we consider gunbarrel tanks to be storage tanks; however, they do separate some oil from water as a result of their basic function. How would EPA like to have this particular equipment type addressed?
- What is an appropriate response to Part 2 surveys for which non-operated (non-op) wells and/or divested wells have been selected? Carrizo had (b) (4) wells selected as part of the Part 2 Well Selection, but these wells are either operated by another company (Carrizo shares an interest in the well) or the wells have been sold to another operator and are no longer under Carrizo's control or ownership.

Thank you for your consideration of Carrizo's request, and we look forward to clarification for our questions above. If you have any questions, or if more information is needed, please feel free to contact me by phone at (713) 328-1000 or by email at (b) (6) @carrizo.com.

Sincerely,

(b) (6)

(b) (6)

Director of Compliance

Cc: Ms. Brenda Shine
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

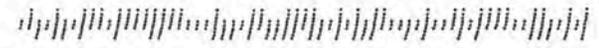


CARRIZO OIL & GAS, INC.
500 DALLAS STREET • SUITE 2300
HOUSTON, TEXAS 77002

Ms. Brenda Shine
Office of Air Quality Planning & Standards
US Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle, NC 27709

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 ZIP 77002
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27709\$0310 R777



0AR-17-000-4239

LAREDO

PETROLEUM, INC.

15 W. 6th Street, Suite 900 • Tulsa, Oklahoma 74119
Phone: (918) 513-4570 • Fax: (918) 513-4571

RECEIVED JAN 10 2017

*Extension granted via email.
Laredo also requested
an extension via
email. JTB*

1/10/17

*✓ 16 Part 1+2
Henry*

January 4, 2017

Via Certified Mail
#7013 2250 0001 3488 3319

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility IDs 1377100 & 2443000

Dear Mr. Tsirigotis:

I am the Corporate HS&E Director for Laredo Petroleum, Inc. ("Laredo"). On December 8, 2016, Laredo received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facilities. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

Laredo is, in relevant terms, a smaller operator. In our EH&S department we currently have **(b) (4)** individual tasked with overseeing our air quality compliance, and **(b) (4)** is responsible for collecting information on approximately **(b) (4)** wells/facilities spread out over approximately 1160 square miles. Much of the information **(b) (4)** requested in your correspondence is not readily available and will require visits to each site or visual inspections of aerial photographs of every location, as this is not a task that can be delegated to someone else. As you know, this data collection and response requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability for errors.

In addition to limited personnel resources, the ICR falls partially over the holiday season and at the end of the year when (b) (6)

I would also note that the timing for the ICR could not be worse given the required reporting requirements associated with annual emissions inventory, annual greenhouse gas ("GHG") reporting, and Sara Title III. Given Laredo's limited personnel, I have to balance reporting obligations and the ICR while continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities (i.e. required inspections, permitting requirements, and preparation for multiple compliance deadlines associated with NSPS OOOOa).

Further, it is unclear to me how to calculate the precise due date of the response because of the holidays; therefore, I ask that you indicate in your response when the EPA considers the response due.

Considering the time it is taking/will continue to take to complete the Part 1 Survey (not to mention the time to complete our GHG reporting and maintain compliance with existing state and federal environmental regulations) we project that we will not be able to make much if any progress on the Part 2 Survey until after our GHG reporting is complete on March 31st. This means that while you have provided 180 days to complete the Part 2 Survey, our actual time to work on it is approximately 67 days based on our receipt of the ICR on December 8th, 2016. While we will work diligently to fulfill the ICR, Laredo simply does not have the resources to work concurrently on both Surveys while also addressing the current environmental regulatory burden.

Finally, in addition to requesting additional time to respond for the reasons set forth above, certain aspects of the Part 1 Survey and Part 2 Survey are unclear to me. Therefore, I request clarification of the following:

- *How should a vapor recovery unit (VRU) be treated in Part 1? Specifically, these are reciprocating type compressors but our VRU's do not have rod packing and operate at low pressure. Gas that gets by the cylinders is captured in the blow case and recycled into suction. If we report these as reciprocating compressors my concern is that they will be treated the same as a high pressure reciprocating compressor and therefore emission estimates will be overestimated. (b) (4) of Laredo's reciprocating compressors are low pressure VRU's. None of our Part 2 facilities have a VRU associated with it therefore I don't believe that EPA will be able to discern the difference between a VRU and high pressure reciprocating units. Please advise us on how to address these units.*
- *In the Part 2 Survey Production Wells tab there is a column for "Type of well bore". The options are multilateral design or capillary string. However, we would not consider many of our wells to be either of these options. Please provide information on how we should answer this question.*

already resolved

Page 3
January 4, 2017
Mr. Peter Tsirigotis

I am certain that there are additional questions that we will have when we get the chance to begin to address Part 2 of the Survey.

Please contact me if you have any questions and I look forward to hearing from you on both our request for an additional 60 days, and the answers to my questions addressed above.

Sincerely,

(b) (6)

A large black rectangular redaction box covering the signature area.

(b) (6)

Laredo Petroleum, Inc.
Corporate HS&E Director

cc: Ms. Brenda Shine ✓
Via Certified Mail #7013 2250 0001 3488 3302

LAREDO
PETROLEUM, INC.

15 West 6th Street, Suite 900
Tulsa, Oklahoma 74119

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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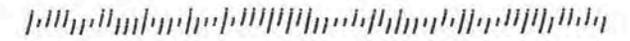


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Mailed From 74119
01/04/2017
031A 0005181108

Ms. Brenda Shine
Office, Air Quality Planning & Standard
United States Environmental Protection
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709+0310



OAR-17-000-4250

P1+2



RECEIVED JAN 10 2017
Troy Jordan
Director, Environmental

December 14, 2016

VIA CERTIFIED MAIL NO. 7190 1084 2180 0252 3551

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW,
Washington, DC 20460

Dear Ms. Shine:

Chesapeake Energy received Information Collection Requests (ICRs) per Docket ID No. EPA-HQ-OAR-2016-0204 for the following 14 Facility IDs on or about December 5, 2016:

1125600, 1125650, 1125700, 1317800, 1312100, 1187350, 1636700,
1557750, 1085250, 1335250, 1229200, 1143700, 1545850, 2144000

These ICRs are unprecedented in terms of the breadth and depth of detail of information EPA is requesting.

In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for all Part I requests and a 180 day extension for all Part II requests. These extensions are both reasonable and necessary as much of the information will require detailed and facility-specific information, including equipment counts and product composition analyses. The current time allotted is insufficient to thoroughly and accurately compile, review and submit the information requested.

By granting these extensions and allowing 120 days from receipt of each ICR to respond to Part I and 360 days from receipt of each ICR to respond to Part II, EPA will be giving Chesapeake Energy much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

Director, Environmental
Chesapeake Energy

Chesapeake Energy Corporation

P.O. Box 18496 • Oklahoma City, OK • 73154-0496 • 6100 N. Western Avenue • Oklahoma City, OK 73118
Telephone: (405) 935-4503 • Fax: (405) 849-4503 • troy.jordan@chk.com



7190 1084 2180 0252 3551

U.S. Environmental Protection Agency
Brenda Shine
Office of Air Quality Planning and Standards
Mail Code 28221T, 1200 Pennsylvania Ave.
NW.
Washington D.C., D.C. 20460

Chesapeake Energy Corporation
P.O. Box 18496
Oklahoma City, OK 73154-0496

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12/15/2016

US POSTAGE

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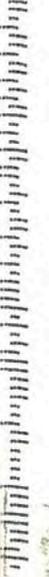


ZIP 73118
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*R.T.P.
NC*

E 143-01



OAR-17-000-4252
I+A



X

RECEIVED JAN 10 2017

December 15, 2016

(b) (6)

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Oklahoma City, OK
73105

(b) (6)

PO Box
Okl City, OK 73126

Dear Ms. Shine:

We recently received an Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Sincerely,
CONTINENTAL RESOURCES, INC.

(b) (6)

(b) (6)

Senior Environmental Director

- cc: Jodi Howard, USEPA Research Triangle Park
- (b) (6) Northern Region Environmental Manager
- (b) (6) Southern Region Environmental Manager
- (b) (6) Senior Environmental Specialist
- (b) (6) Senior Staff Engineer



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7012 3460 0003 1857 4807

OKLAHOMA CITY
OK 730
16 DEC '16
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ZIP 73102 \$ 006.94⁰
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0000339788 DEC 15 2016

Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

DEC 22 2016

E143-01

20460-



OAR-17-000-4263 P1+2



January 4, 2017

Certified Mail: 7016 1370 0001 1980 5391

Ms. Brenda Shine
U.S. EPA
109 T.W. Alexander Drive Mailcode: E143-01
Research Triangle Park, NC 27709


RECEIVED JAN 10 2017

RE: Information Collection Request
Midstates Petroleum Corporation
Primary Facility ID# 1436600

Dear Ms. Shine:

Midstates Petroleum (Midstates) is in receipt of two letters from Mr. Peter Tsirigotis, Director of the Sector Policies and Programs Division of the EPA's Air Quality Planning and Standards Office. These letters were received on December 8, 2016 and requested data with respect to our production facilities.

I have reviewed the request and Midstates will provide our facility data as soon as practical. However, as you well know the amount of information being requested is extensive and will require an appreciable amount of time to gather and populate the forms EPA has provided.

That said, we have some points which we need EPA to clarify before we can respond.

- 1) The analytical data you have requested seems to ask for three sampling points per well, but our well pads have three or sometimes four well production lines running in parallel. Are we to only provide information for a single line? Twelve sample locations seems excessive and overly burdensome when each production line would be running under similar conditions and the product originating from the same general area of the basin in question.
- 2) We requested, via letter and email, an extension to the deadline for responding to Part 1 of the survey. We have not received any acknowledgement or reply. The extension request for our Part 1 response asked to extend the deadline to March 8, 2017. Please provide a response to our request.
- 3) We additionally request an extension to the Part 2 request of 60 days. This would put our response deadline at August 8, 2017.
- 4) While filling out *Section 3-Gas Composition* of the Facility worksheet in the Part 2 spreadsheet we noticed that Methane is not listed in the *Components* list. Will there be a revised spreadsheet that includes Methane in the gas component list or are we to omit Methane from our response?
- 5) One of the wells selected for the Part 2 ICR is an (b) (4) [REDACTED] (b) (4) [REDACTED] As such, we do not have information regarding well pressure or GOR in the first

30 days of production (columns W and AJ, *Section 2-General Well Information* of the **ProdnWells** worksheet). Should we leave these cells in the worksheet blank?

- 6) *Section 2-General Tank/Separator Information* of the **Tanks Separator** worksheet requires that separators discharging liquids to atmospheric storage tanks be listed and a reason given if a tank or separator is not subject to OOOO. The only choices for exemption from OOOO are: (1) *Less than 6 tpy of VOC*; (2) *Date of installation*. The separators at the site are not subject to OOOO because they are not considered storage vessels by definition; these vessels are designed to operate in excess of 204.9 kPa (29.7 psig) without emissions to the atmosphere. What should we put as the reason in column G, Part 2 of this worksheet?

Midstates will make a good faith effort to respond to your requests to provide the data by the new deadlines, but we need your help in clarifying how we are to respond. Should you have any questions you may contact (b) (6) of my staff, at (b) (6) @midstatespetroleum.com or by telephone at (b) (6)

Respectfully,

(b) (6)

(b) (6)

Vice President, EHS
Midstates Petroleum



321 South Boston
Suite 1000
Tulsa, OK 74103

[Handwritten red mark]

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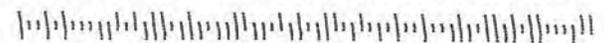


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Ms. Brenda Shine
U.S. EPA
109 T.W. Alexander Drive Mailcode: E143-01
Research Triangle Park, NC 27709

27709#0310 R777





OAR-17-0004254

P1+2

9

RECEIVED 2017 0 2017

January 6, 2017

Oasis Petroleum
1001 Fannin Street, Suite 1500
Houston, TX 77002

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Request for Extension of EPA Oil and Gas ICR Submission Deadlines

Dear Ms. Shine:

We received three letters regarding EPA Information Collection Request (ICR) No. 2548.01 on December 9, 2016. Based on the receipt date, we are required to submit responses to Part 1 and Part 2 by February 7, 2017 and June 7, 2017, respectively. Oasis Petroleum is committed to providing the most accurate and complete information possible, and to that end we respectfully request a 30-day extension for both Parts 1 and 2 of the ICR, making our proposed submission deadlines March 9, 2017 and July 7, 2017, respectively.

Given the extensive scope of information sought, we are confident that additional response time is absolutely necessary. Much of the requested information will require calculations and determinations drawn from disparate data sources; some information will require detailed, site-specific reviews; and all information will require thorough review prior to submission to ensure accuracy. In addition, practical questions regarding EPA's preferred organization of data, among other preliminary matters, have caused delays as we await further direction. Granting a 30-day extension for both Parts 1 and 2 will allow our company much-needed time to respond to the ICR.

Thank you for your consideration of this request.

Respectfully,

(b) (6)

(b) (6)

Regulatory Manager
Oasis Petroleum

(b) (6)

Enclosure: Documentation of certified mail receipt of ICR letters

Cc: Peter Tsigotis, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency

Tracking Number: 92148969009997901735384356



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Product & Tracking Information

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DATE & TIME	STATUS OF ITEM	LOCATION
December 9, 2016 , 2:56 pm	Delivered, Left with Individual	HOUSTON, TX 77002

Your item was delivered to an individual at the address at 2:56 pm on December 9, 2016 in HOUSTON, TX 77002.

December 9, 2016 , 4:20 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:20 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:24 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:24 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:09 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

Return Receipt Electronic

Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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December 9, 2016 , 5:56 am	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:49 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:49 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:34 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

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Text Updates

Email Updates





Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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11/11/16 10:11 AM

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December 9, 2016 , 4:13 am	Departed USPS Destination Facility	NORTH HOUSTON, TX 77315
December 8, 2016 , 1:21 pm	Arrived at USPS Destination Facility	NORTH HOUSTON, TX 77315
December 6, 2016 , 8:41 pm	In Transit to Destination	
December 5, 2016 , 10:25 pm	Departed USPS Facility	GREENSBORO, NC 27498
December 5, 2016 , 8:41 pm	Arrived at USPS Origin Facility	GREENSBORO, NC 27498
December 5, 2016 , 7:26 pm	Accepted at USPS Origin Facility	DURHAM, NC 27709
November 29, 2016	Pre-Shipment Info Sent to USPS, USPS Awaiting Item	

Available Actions

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Text Updates

Email Updates

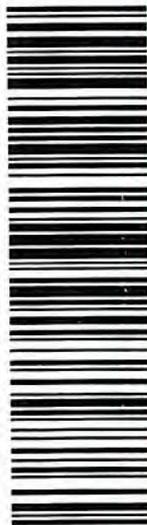




Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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Houston, Texas 77002

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Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, NC 27709



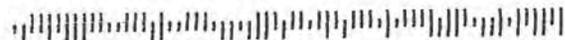
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RECEIVED JAN 11 2017

January 5, 2016

Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Dear Ms. Shine:

SG Interests I, Ltd. (SG) (Facility ID 1596300) is in receipt of an Information Collection Request dated November 14, 2016 and received by SG on December 9, 2016. SG needs more time to gather the information requested and hereby requests a 60 day extension to respond for both Parts I and II. This would result in 120 days to respond to Part I and 240 days to respond to Part II. The extension will allow SG the time necessary to provide accurate and complete information.

Thank you for your consideration of this request.

Sincerely,

SG Interests I, Ltd.
By: Gordy Oil Company
General Partner

(b) (6)

(b) (6)
Vice President - Land



SG INTERESTS I, LTD.
100 WAUGH DRIVE, SUITE 400
HOUSTON, TEXAS 77007

To Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Dr. Mail Code: E3143-01
Research Triangle Park, NC 27709

CAR-17-000-5606

P1+2

DIVIDE CREEK GATHERING SYSTEM, LLC

C/O SG Interests I, Ltd.
100 Waugh, Suite 400
Houston, Texas 77063
713.951.0100

1/11/2017

January 5, 2016

Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Dear Ms. Shine:

Divide Creek Gathering System, LLC (Divide Creek) (Facility ID 5002710) is in receipt of an Information Collection Request dated November 14, 2016 and received by Divide Creek on December 6, 2016. Divide Creek needs more time to gather the information requested and hereby requests a 60 day extension to respond for both Parts I and II. This would result in 120 days to respond to Part I and 240 days to respond to Part II. The extension will allow Divide Creek the time necessary to provide accurate and complete information.

Thank you for your consideration of this request.

Sincerely,

Divide Creek Gathering System, LLC

(b) (6)

(b) (6)

Management Committee Member

Cc: (b) (6)
Gunnison Energy Corporation
1801 Broadway, Suite 1200
Denver, CO 80202

OAR-17-000-5610

P1+2



And try-11-17

January 6, 2017

RECEIVED JAN 13 2017

1/11/2017

Mr. Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

RE: Request for Extension to Respond to the Information Collection Request (ICR) for the Oil & Natural Gas Sector—Part 1 & Part 2

Facility ID 1112400 – Carrizo (Eagle Ford) LLC
Facility ID 1112450 – Carrizo (Marcellus) LLC
Facility ID 1112500 – Carrizo (Permian) LLC
Facility ID 1112550 – Carrizo (Utica) LLC
Facility ID 1112650 – Carrizo (Niobrara) LLC
Facility ID 1112700 – Carrizo Oil & Gas, Inc.

Dear Mr. Tsirigotis:

On December 9, 2016, Carrizo received multiple letters from you dated November 14, 2016, requesting information regarding the above referenced facilities. For the following reasons, Carrizo is respectfully requesting an extension to the 60 days and 180 days required to respond to the ICR Part 1 and Part 2 surveys, respectively.

Carrizo is concerned that the ICR due dates have not taken into consideration multiple federal holidays that fall within the allotted 60 day/180 day turnaround. Additionally, due to the December holidays, limited staff is/have been available to collect, review, and prepare the requested data. Furthermore, the ICR project is concurrent with multiple other state and federal air quality reporting obligations Carrizo must comply with including NSPS OOOO reporting, Annual GHG Subpart W reporting, Annual Emissions Inventories, and Annual Permit Evaluation Reports. Carrizo is diligently working to comply with the ICR requirements, while also balancing the reporting burden of other existing and ongoing environmental, air quality obligations.

In addition to requesting additional time to complete Part 1 and Part 2, Carrizo has concerns on how to handle various elements of the data being collected, which are outlined below:

- What is an acceptable "Surface Site ID"? Many of Carrizo's facilities either have multiple State-issued permits/registration numbers or the facilities are authorized under Exemptions which don't have assigned permit/registration numbers.
- How do we account for gunbarrel tanks in the tank and/or separator category(ies)? At Carrizo, we consider gunbarrel tanks to be storage tanks; however, they do separate some oil from water as a result of their basic function. How would EPA like to have this particular equipment type addressed?
- What is an appropriate response to Part 2 surveys for which non-operated (non-op) wells and/or divested wells have been selected? Carrizo had (b) (4) wells selected as part of the Part 2 Well Selection, but these wells are either operated by another company (Carrizo shares an interest in the well) or the wells have been sold to another operator and are no longer under Carrizo's control or ownership.

Thank you for your consideration of Carrizo's request, and we look forward to clarification for our questions above. If you have any questions, or if more information is needed, please feel free to contact me by phone at (713) 328-1000 or by email at

(b) (6) @carrizo.com.

Sincerely,

(b) (6)

(b) (6)

Director of Compliance

Cc: Ms. Brenda Shine
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

Cimarex Energy Co.
202 S. Cheyenne Ave.
Suite 1000
Tulsa, Oklahoma 74103-4346
PHONE 918.560.7257
FAX 539.777.0501

CAE-17000-4251

pg

email sent in lieu
of hard copy.
Spoke to Ms.
McConium.

(b) (6)

1/10/17

Stuart Wittenbach
ES&H Director

CIMAREX

Certified Mail (941481020088 2268 2634 28)

January 5, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED
JAN 10 2017

Re: Information Collection Request – Part 2, CAA §114 Request for Extension

Dear Ms. Shine:

Cimarex Energy Co. (Cimarex) received the Part 2 Information Collection Request (ICR) for Oil and Gas Production Facilities on December 8, 2016, and for Gathering and Boosting Facilities on December 12, 2016. Cimarex is kindly requesting these be submitted concurrently and an extension of 90 days be granted, having the deadline for submittal be September 8, 2017.

The law supports providing a 90-day extension of the deadline for responding to the Part 2 Operator Survey. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case – § 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator *may reasonably* require” – requires EPA to set reasonable deadlines.

The Part 2 Operator Survey asks for detailed information and sample collection and processing for the selected facilities. The completion of the Part 2 survey will take effort and collaboration from different region operations and departments within Cimarex, in addition to working with consulting groups and third party laboratory services that could have potential delays. This process will require substantial time and resources, and a thorough QA/QC of the data will be necessary to verify its accuracy and compile the data into the form requested by the Agency. All of these must be completed whilst completing the Part 1 ICR. The 180-day deadline imposed by the ICR is considered an unreasonable amount of time in which to complete this work.

Notably, EPA is under no legally enforceable deadline for completing the § 111(d) regulation for which this information is being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 90-day extension will not prevent EPA from meeting legal obligations and will not unreasonably delay issuance of the rule.

Should you or members of your staff have any questions or require additional information, please contact me at (918)560-7257 or via email at (b) (6)@cimarex.com.

Ms. Brenda Shine, U.S. EPA
January 5, 2017
Pg. 2 of 2

Sincerely,
Cimarex Energy Co.

(b) (6)

A large black rectangular redaction box covers the majority of the page's content, starting below the signature and ending above the cc line.

Stuart Wittenbach
ES&H Director

cc: Peter Tsigotis, U.S. EPA Director, Sector Policies and Programs Division, Office of Air Quality
Planning and Standards

Certified Mail (94148102 00793257 507051)

Air Quality Library File: AQ-11-01 (ICR Part 2 Extension Request)

1/5/2017

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TULSA OK 74103-3001

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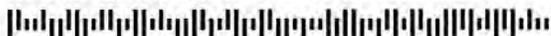
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US EPA - Research Triangle Park
Ms. Brenda Shine
E143-01
109 T. W. Alexander Drive
RESEARCH TRIANGLE PARK NC 27709-0002



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0912-17-000-4290 P1

DELTA CO2, LLC
P.O. BOX 387 • PHONE: 254/559-9841
BRECKENRIDGE, TEXAS 76424-0387

January 6, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR Facility ID 1178850 Delta CO2, LLC

Dear Mr. Tsirigotis:

On December 9, 2016, my company, Delta CO2, LLC, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

As a result of market conditions we have trimmed our staff to [redacted] employees and they are responsible for collecting information on [redacted] wells spread out over Yoakum and Gaines County. Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season (b) (6) [redacted] (b) (6) [redacted]. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me.

- Whose responsibility is it to respond when there is more than one owner?
- Whose responsibility is it to respond when the operator is different than the owner?

Mr. Peter Tsirigotis
January 6, 2017
Page 2

- All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?
- I have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. How does EPA view this equipment?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

(b) (6)

Delta CO2, LLC
Director of Special Projects

cc: Ms. Brenda Shine



DELTA CO2, LLC
P.O. BOX 387
BRECKENRIDGE, TEXAS 76424-0387



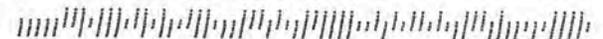
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X

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

2770930310 R777





HURD ENTERPRISES, LTD.

OAL-17-000-4344

PIA

RECEIVED JAN 13 2017

January 10, 2017

United States Environmental Protection Agency
Washington DC 20460

RE: Section 114 Letter received December 8, 2016

To Whom It May Concern:

We request an extension of time to comply with the EPA's request as described in the Section 114 correspondence dated November 14, 2016 and received by Hurd Enterprises on December 8, 2016, to provide information related to our oil gas properties. The reason an extension is required is due to the personnel needed to gather and compile the information requested.

Hurd Enterprises is currently without (b) (4)

(b) (4) This is hampering our efforts to comply with this request in a timely manner as we engage (b) (4)

Based on the date the letter was received by Hurd Enterprises, the original due date would be February 6, 2017. We formally request a 60-day extension of time to supply the information requested in the Section 114 letter resulting in a revised due date of April 7, 2017.

Thank you for your consideration.

Very truly yours,

Hurd Enterprises, Ltd.

By its General Partner, Hurdco, Inc.

(b) (6)

E. Eugene Garcia, President



7373 BROADWAY, SUITE 200
SAN ANTONIO, TX 78209

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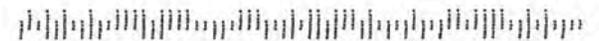
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SAN ANTONIO
TX 7820
10 10AM '17
PM 42



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





0AR-17-000-4345
P 42

COLTON ENVIRONMENTAL MANAGEMENT

01-04-17

RECEIVED JAN 13 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID: 1514800
Pinnacle Operating Company, Inc.
P. O. Box 52074
Shreveport, LA 71135-2074

Dear Mr. Tsirigotis:

Our company Colton Environmental Management, Inc., (CEM) has been contracted by Pinnacle Operating Company, Inc. (POC) to help address and answer the EPA's Information Collection Request (ICR) pertaining to Section 114 of the Clean Air Act (CCA). On 12-12-16, Pinnacle Operating, Inc., received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, we respectfully request an extension of 90 days to respond to the information collection request (ICR).

As a result of market conditions in the Oil & Gas industry both CEM and POC have had to reduce our staff over the last few years. Those of us who are remaining are responsible for collecting information on approximately (b) (4) wells spread out over an estimated (b) plus miles reaching from South Central Arkansas to Central Louisiana and over to Central East Texas. Much of the information is not readily available for each site and will require us to personally visit some of the sites. As you know, this information collection requests requires us to certify to the accuracy of the information provided to the United States Environmental Protection Agency (EPA) and subjects our clients to criminal liability, so therefore we want to have time to be sure and submit the correct data. Also, it is unclear to us how to calculate when the response is currently due because of the holidays and request that you indicate in your response when the EPA considers the response due for POC.

ICR Extension Request

Facility ID: 1514800
Pinnacle Operating Co., Inc.
P. O. Box 52074
Shreveport, LA 71135-2074

Along with the complications associated with limited staff and holidays, the ICR deadline stretches us to be in compliance with the annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III programs being due soon. With CEM's and POC's limited staff we have to meet current obligations and the ICR along with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are diligently working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

CEM and POC would greatly appreciate you and/or the EPA granting our extension request. I can be reached at the following email, mailing address or phone.

Respectfully:

(b) (6)

Colton Environmental Management, Inc.
William M. Massey
President, RSO

Mailing Address: Colton Environmental Management, Inc.
Attn: William M. Massey
P. O. Box 6076
Shreveport, LA 71136

Email Address: (b) (6) @coltonenvironmental.com

Office Phone: (b) (6)

Cell Phone: (b) (6)

cc: Ms. Brenda Shine

Colton Environmental
P.O. Box 6076
Shreveport, LA 71136

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Mr. Peter Tsirigotis
Director Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States EPA
109 T. W. Alexander Drive
Research Triangle Park, NC 27709



MERIT ENERGY COMPANY

OAR-17-000-4347

P142

13727 Noel Road · Suite 1200 · Dallas, Texas 75240
Ph 972.701.8377 · Fx 972.960.1252 · www.meritenergy.com

January 6, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1431300 Merit Energy Company, LLC
Facility ID 2514000 Merit Energy Company, LLC
Facility ID 3006010 Merit Energy Company, LLC

Dear Mr. Tsirigotis:

Merit Energy Company, LLC (Merit) received your letters dated November 14, 2016, on December 8, 2016, December 9, 2016 and December 13, 2016. The Information Collection Request (ICR) letters are requesting extensive information regarding the above referenced Facilities. Merit Energy Company, LLC respectfully requests a 90-day extension of the deadline to respond to the information collection request ("ICR").

Merit made several acquisitions of oil and gas properties during the last half of 2016. Some of those acquisitions were effective November 1, 2016 and covered numerous assets in multiple states and counties. Therefore, Merit needs the additional time to obtain the required information from the previous operators. Much of the information is not readily available due to the previous owners and operators reduction in staff resulting from the economic conditions of the oil and gas industry. Personal site visits by environmental specialists will be needed to gather the data which will take additional time.

The ICR requires a certification to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects Merit to criminal liability. In addition to limited/reduced staff, the ICR request fell over the Holiday season when (b) (6)

(b) (6)

I'm sure you are aware the timing of the ICR for Merit and other operators falls within the same time period for reporting annual air emissions inventories, annual greenhouse gas ("GHG") reporting, Sara Title III chemical inventories, air permit compliance certifications, semi-annual monitoring reporting, reporting for Subpart OOOO and various other regulatory related reporting all of which are due in the first quarter of 2017.

Mr. Peter Tsirigotis

January 6, 2017

Page 2

In addition to requesting the extension of the deadline for Merit's response to the ICR, Merit requests clarification of the following questions for the Part 1 and Part 2 Surveys:

- *If a Centralized facility receives production from more than 24 "Surface Site IDs" on the Part 1 survey and the spreadsheet isn't allowed to be modified, how should the operator handle the remaining surface sites associated to the Centralized facility?*
- *How should Field Operator Sites be categorized (i.e. by production field, by field office)?*
- *If a Centralized Production Surface Site also has on site a gas compressor that moves natural gas does EPA consider that site a "Gathering and Boosting Compression Facility" instead of a Centralized Production Surface Site? Merit is not certain how to classify those types of sites for the survey.*

Merit appreciates your consideration of its extension request and your clarifications for the above questions. If you have any questions regarding this request please contact me at

(b) (6) @meritenergy.com or at (b) (6) I look forward to hearing from you.

Sincerely,

MERIT ENERGY COMPANY, LLC

(b) (6)

(b) (6)

North Division Regulatory Manager

cc: Ms. Brenda Shine
via email shine.brenda@epa.gov

Cimarex Energy Co.
202 S. Cheyenne Ave.
Suite 1000
Tulsa, Oklahoma 74103-4346
PHONE 918.560.7257
FAX 539.777.0501

CAR-17-000-4300

pa

sent the
1-11-17

Stuart Wittenbach
ES&H Director



Certified Mail (9414 81020088 2268 2634 28)

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January 5, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Information Collection Request – Part 2, CAA §114** Request for Extension

Dear Ms. Shine:

Cimarex Energy Co. (Cimarex) received the **Part 2 Information Collection Request (ICR)** for Oil and Gas Production Facilities on December 8, 2016, and for Gathering and Boosting Facilities on December 12, 2016. Cimarex is kindly requesting these be submitted concurrently and an extension of 90 days be granted, having the deadline for submittal be September 8, 2017.

The law supports providing a 90-day extension of the deadline for responding to the Part 2 Operator Survey. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case – § 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator *may reasonably* require” – requires EPA to set reasonable deadlines.

The Part 2 Operator Survey asks for detailed information and sample collection and processing for the selected facilities. The completion of the Part 2 survey will take effort and collaboration from different region operations and departments within Cimarex, in addition to working with consulting groups and third party laboratory services that could have potential delays. This process will require substantial time and resources, and a thorough QA/QC of the data will be necessary to verify its accuracy and compile the data into the form requested by the Agency. All of these must be completed whilst completing the Part 1 ICR. The 180-day deadline imposed by the ICR is considered an unreasonable amount of time in which to complete this work.

Notably, EPA is under no legally enforceable deadline for completing the § 111(d) regulation for which this information is being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 90-day extension will not prevent EPA from meeting legal obligations and will not unreasonably delay issuance of the rule.

Should you or members of your staff have any questions or require additional information, please contact me at (918)560-7257 or via email at (b) (6)@cimarex.com.

Ms. Brenda Shine, U.S. EPA

January 5, 2017

Pg. 2 of 2

Sincerely,
Cimarex Energy Co.

(b) (6)



(b) (6)



ES&H Director

cc: Peter Tsirigotis, U.S. EPA Director, Sector Policies and Programs Division. Office of Air Quality
Planning and Standards

Certified Mail (94148102 00793257 5070 51)

Air Quality Library File: AQ-11-01 (ICR Part 2 Extension Request)

1/5/2017

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Peter Tsirigotis
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Oklahoma City, OK 73124
EnableMidstream.com

January 10, 2017

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RECEIVED JAN 13 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request**
Enable McLeod, LLC (ICR ID 2878000)

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable McLeod, LLC (ICR ID 2878000), received the ICR for the Gathering and Boosting Segment on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

Enable McLeod appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that Enable McLeod and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., Enable McLeod respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable McLeod, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



PO Box 24300, LS700
Oklahoma City, OK 73124

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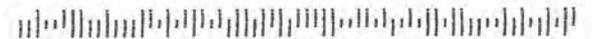


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MS. BRENDA SUINE
U.S. ENVIRONMENTAL PROTECTION
AGENCY
109 T.W. ALEXANDER DRIVE, MAIL
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MS. BRENDA SUINE

27709-091099





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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request
Enable Oklahoma Intrastate Transmission, LLC
Bennington Compressor Station (ICR ID 4005700)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Oklahoma Intrastate Transmission, LLC (EOIT), received the ICR for the Bennington Compressor Station (ICR ID 4005700) as a Transmission Facility on December 19, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 18, 2017.

EOIT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EOIT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EOIT respectfully requests a 45 day extension until August 3, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Oklahoma Intrastate Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709

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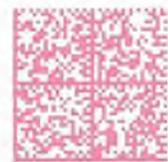
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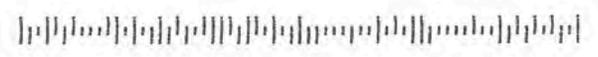
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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request**
Enable Gas Transmission, LLC
Ruston Storage Station (ICR ID 6001150)

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Gas Transmission, LLC (EGT), received the ICR for the Ruston Storage Station (ICR ID 6001150) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EGT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EGT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EGT respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Gas Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



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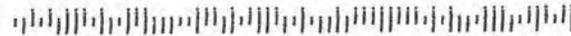
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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Oil and Gas Information Collection Request**
Enable Gas Gathering, LLC (ICR ID 2270000)

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Gas Gathering, LLC (EGG) (ICR ID 2270000), received the ICR for the Gathering and Boosting Segment on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EGG appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EGG and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EGG respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6)@enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Gas Gathering, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



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January 10, 2017

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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

Re: **Oil and Gas Information Collection Request
Enable Mississippi River Transmission, LLC
Biggers Compressor Station (ICR ID 4005750)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Mississippi River Transmission, LLC (MRT), received the ICR for the Biggers Compressor Station (ICR ID 4005750) as a Transmission Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

MRT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that MRT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., MRT respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

Please note that the ICR letter was addressed to Enable Gas Transmission, LLC. The Biggers Compressor Station is an asset of Enable Mississippi River Transmission, LLC. This should be corrected in the database upon submittal of the ICR data.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Mississippi River Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



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January 10, 2017

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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

**Re: Oil and Gas Information Collection Request
Enable Mississippi River Transmission, LLC
St. Jacob Compressor Station (ICR ID 6001170)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Mississippi River Transmission, LLC (MRT), received the ICR for the St. Jacob Compressor Station (ICR ID 6001170) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

MRT appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that MRT and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., MRT respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6) @enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Mississippi River Transmission, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



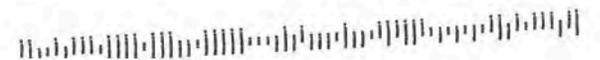
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MS. BRENDA SHINE
U.S. ENVIRONMENTAL PROTECTION
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(316) 262-3573

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January 9, 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: REQUEST FOR EXTENSION OF TIME

Dear Ms. Shine:

Vincent Oil Corporation ("Vincent Oil") received a letter dated November 14, 2016, on or about November 18, 2016 from Peter Tsirigotis pursuant to section 114 of the Clean Air Act. Said letter requested Vincent Oil provide certain information to assist the EPA in developing emission standards through a Survey. Said letter also requested the Survey be completed within 60 days of receipt (the above described letter is hereafter referred to as the "November 14th Letter"). Thus, by Vincent Oil's calculation, the EPA wishes the information be provided on or about February 15, 2017, **assuming the 60 days are business days.**

Vincent Oil has reviewed the Survey and much of the information requested is not readily available. For example, Vincent Oil does not have the locations of some of its facilities recorded via latitude and longitude and would need to have field personnel either obtain or verify location data on a per site basis. This is simply one example, Vincent Oil will require time to obtain several other portions of the survey that are either not tracked by Vincent Oil's current filing systems or are maintained in a variety of separate filing systems. Vincent Oil is a small company whose employment has been reduced recently due to current economic difficulty within the industry as well as (b) (6)

(b) (6)

REQUEST FOR EXTENTION OF TIME
Vincent Oil Corporation
January 9, 2017

Further, Vincent Oil is unclear whether the information it will/could provide will be relevant to the Survey. Due to the above mentioned economic difficulties, Vincent Oil has only completed (b) (4) wells after the September 18, 2015 effective date of regulation 40 CFR 60.5397a Subpart OOOOa, which seems to Vincent Oil to be an important factor upon review of the Survey.

In any event, should the EPA still value the information Vincent Oil would/could provide in the Survey considering the above, Vincent Oil will require more time. As such, Vincent Oil formally requests an additional (90) business days be added to the timeline requested by the November 14th Letter.

As Vincent Oil is unfamiliar with the Survey and it's related requirement, please provide any clarification or additional information that could change Vincent Oil's assumptions above. We look forward to your response. Contact via e-mail may be made at (b) (6) @vincentoil.com and Vincent Oil welcomes correspondence via that medium.

Sincerely,

(b) (6)

Secretary and Vice President

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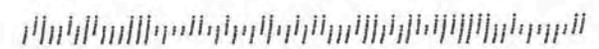
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ZIP 67202
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U.S.Environmental Protection Agency
Attention: Ms. Brenda Shine
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





12273 County Road 1560
Ada, OK 74820
Ph: (580) 332-2243
Fax: (580) 798-4457

0AR-17-000-4342

P1+2

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1/2/2017

Attention: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Regarding: ICR Request
Purpose: Request for Extension Part 1 & 2
Facility ID: 1108000
e-GGRT code: ND3Q-IFAG

Dear Brenda,

Cantrell Energy would like to request a 60 day extension to file both part 1 and part 2 of the EPA - ICR survey request. I am a very small operator and have (b) (6) compliance personnel. Also, I (b) (6) (b) (6) and am very concerned with correctly completing the forms.

However, I am very committed to compliance. I am planning on attending an instructional course for ICR on January 11, 2017. Also, (b) (4) (b) (4)

I know you must be very busy with this issue. I apologize for adding any additional strain to your workload. Thank you for your consideration.

Sincerely,

(b) (6)

Blake Cantrell
President
Cell Phone #: (b) (6)
Email: (b) (6)@aol.com

CANTRELL ENERGY
12273 COUNTY ROAD 1560
ADA, OK 74820

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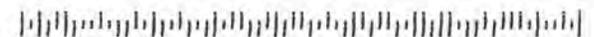
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Research Triangle Park, NC 27709

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BAYSWATER
EXPLORATION & PRODUCTION, LLC

OAR-17-000-4343

P 1+g

January 5, 2017

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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander, Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
shine.brenda@epa.gov

Re: Petition for Extension of Submittal Deadline for EPA's Part 1 and Part 2 Information Collection Request

Dear Ms. Shine:

Bayswater Exploration & Production, LLC ("Bayswater") requests a 60-day extension to complete Part 1 of the Information Collection Request (ICR), received by Bayswater on December 13, 2016. If EPA approves this extension, Bayswater will submit its response to Part 1 of the ICR on or before April 12, 2017. Bayswater also requests a 90-day extension to reply to both sections of Part 2 of the ICR, which it received in two separate mailings; if EPA approves this extension, Bayswater will submit its responses to Part 2 (Production Well Facilities) on or before September 9, 2017 and Part 2 (Gathering and Boosting Facilities) on or before September 4, 2017.

As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide the sought-after information. Bayswater operates over (b) wells and approximately (b) tank batteries. The Part 1 survey requires that we provide data for each well and its corresponding tank battery. The level of effort that will be necessary to respond to the ICR will be extensive and will require a significant amount of time to complete. In addition, the timing of receipt of the ICR fell right at the beginning of the holiday season, a time when Bayswater encourages its employees to spend time with their families. As such, Bayswater's relevant personnel will not have the opportunity to start this process until well into January 2017.

Additionally, Bayswater will be required to work with a contractor/laboratory to conduct the pressurized sampling required by Part 2. The level of detail requested is immense and due to the fact that we will need to visit the Part 2 facilities and coordinate a contractor/laboratory to sample and analyze oil and water samples, additional time is warranted. Bayswater will also be required to conduct a significant level of internal and legal review to identify any Confidential Business Information included in the responsive data and information and to support such claims accordingly. We will also be working on a number of other federal and state annual reporting tasks at the same time, including, for example, EPA's SARA Tier II reporting, GHG Reporting, NSPS OOOO assessments, and Colorado's Regulation No. 7 reporting under Section XII

(monthly control downtime reports and semi-annual submittal) and Section XVII (STEM/LDAR Inspections and annual LDAR Report).

The law supports providing the 60-day and 90-day extensions of the deadline for responding to Parts 1 and 2, respectively. The Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of § 114 on which EPA must be relying as authority in this case—§ 114(a)(1)(G), which authorizes EPA to request “such other information as the Administrator may reasonably require”—requires EPA to set reasonable deadlines.

Notably, EPA is under no legally enforceable deadline to promulgate the § 111(d) regulation for which this information is ostensibly being gathered. Moreover, it likely will take the Agency upwards of two years or more to ultimately issue the final rule. In this context, a 60-day and 90-day extension will not prevent EPA from meeting any legal obligations, will not unreasonably delay issuance of the rule, and will allow Bayswater to collect all the requested information in the time allowed.

Bayswater appreciates your consideration of its petition for extension to respond to Part 1 and Part 2 of the ICR. Please feel free to contact me if you have any questions or need more information at (303) 893-2503

(b) (5)

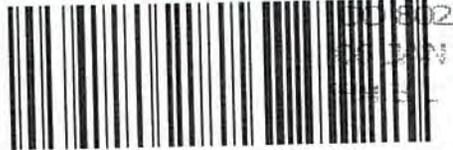
A large black rectangular redaction box covers the majority of the text in this section. The text "(b) (5)" is written in red at the top left corner of the redacted area.

Environmental Specialist
Bayswater Exploration & Production, LLC



BAYSWATER
 EXPLORATION & PRODUCTION, LLC
 730 17TH STREET, SUITE 610
 DENVER, COLORADO 80202

CERTIFIED MAIL®



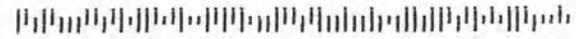
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UNITED STATES POSTAGE

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27709-000209





HURD ENTERPRISES, LTD.

OAL-17-000-4344

PIA

RECEIVED JAN 13 2017

January 10, 2017

United States Environmental Protection Agency
Washington DC 20460

RE: Section 114 Letter received December 8, 2016

To Whom It May Concern:

We request an extension of time to comply with the EPA's request as described in the Section 114 correspondence dated November 14, 2016 and received by Hurd Enterprises on December 8, 2016, to provide information related to our oil gas properties. The reason an extension is required is due to the personnel needed to gather and compile the information requested.

Hurd Enterprises is currently (b) (4)

(b) (4) This is hampering our efforts to comply with this request in a timely manner as we engage (b) (4)

Based on the date the letter was received by Hurd Enterprises, the original due date would be February 6, 2017. We formally request a 60-day extension of time to supply the information requested in the Section 114 letter resulting in a revised due date of April 7, 2017.

Thank you for your consideration.

Very truly yours,

Hurd Enterprises, Ltd.
By its General Partner, Hurdco, Inc.

(b) (6)

E. Eugene Garcia, President



HURD ENTERPRISES, LTD.

OAL-17-000-4344

P141

RECEIVED JAN 13 2017

January 10, 2017

United States Environmental Protection Agency
Washington DC 20460

RE: Section 114 Letter received December 8, 2016

To Whom It May Concern:

We request an extension of time to comply with the EPA's request as described in the Section 114 correspondence dated November 14, 2016 and received by Hurd Enterprises on December 8, 2016, to provide information related to our oil gas properties. The reason an extension is required is due to the personnel needed to gather and compile the information requested.

Hurd Enterprises is currently (b) (4)

(b) (4) This is hampering our efforts to comply with this request in a timely manner as we engage

(b) (4)

Based on the date the letter was received by Hurd Enterprises, the original due date would be February 6, 2017. We formally request a 60-day extension of time to supply the information requested in the Section 114 letter resulting in a revised due date of April 7, 2017.

Thank you for your consideration.

Very truly yours,

Hurd Enterprises, Ltd.
By its General Partner, Hurdco, Inc.

(b) (6)

E. Eugene Garcia, President



7373 BROADWAY, SUITE 200
SAN ANTONIO, TX 78209

CERTIFIED MAIL



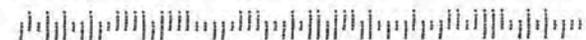
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SAN ANTONIO
TX 78209
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PM 4:2



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099





OAR-17-000-4351
PI

PO Box 24300, M/C LS700
Oklahoma City, OK 73124
EnableMidstream.com

January 10, 2017

VIA CERTIFIED MAIL #7015 1660 0000 5921 3219

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 17 2017

**Re: Oil and Gas Information Collection Request
Enable Products, LLC
Wetumka Gas Processing Plant (ICR ID 6001180)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Products, LLC (EP), received the ICR for the Wetumka Gas Processing Plant (ICR ID 6001180) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EP appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EP and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EP respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (b) (6) or at (b) (6)@enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Products, LLC

(b) (6)

Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL



7015 1660 0000 5921 3219

ITNERS

PO Box 24300, LS700
Oklahoma City, OK 73124

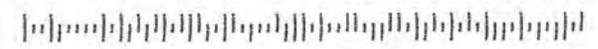
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OK 730
10 JAN '17
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 MAILED FROM ZIP CODE 73102

MS. BRENDA SHINE
U.S. ENVIRONMENTAL PROTECTION
AGENCY
109 T.W. ALEXANDER DRIVE, MAIL
CODE: E143-01
RESEARCH TRIANGLE PARK, NC 27709

27709-031099



Killam Oil Co., Ltd.

OAR-17-000-4356

P1

4320 University Blvd.
P.O. Box 499
Laredo, Texas 78042

Phone 956.724-7141
Fax 956.724-2005
E-mail (b) (6) @killamco.com

January 10, 2017

VIA CERTIFIED MAIL
7015 0640 0001 6047 8315

RECEIVED JAN 17 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1360300, Killam Oil Co., Ltd ("Killam")

Dear Mr. Tsirigotis:

On December 9, 2016, Killam Oil Co., Ltd ("Killam"), received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, Killam respectfully requests an extension of 60 days to respond to the information collection request ("ICR")!

As a result of market conditions, Killam has reduced office staff and field personnel who are responsible for operating and collecting information on approximately over (b) (6) wells and related facilities spread out all over South Texas. Much of the information is not readily available and will require staff to personally visit each site. As you know, this information collection requires Killam to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects Killam to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season (b) (6). Additionally, it is unclear to Killam, how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

Please contact me if you have any questions and I look forward to hearing from you concerning our request for additional time to respond. Please include (b) (6) @killamco.com on any email response to this letter.

(b) (6)
(b) (6)
Land Manager

cc: Ms. Brenda Shire

Killam Oil Co., LTD.
[REDACTED]
Laredo, Texas 78042-0499

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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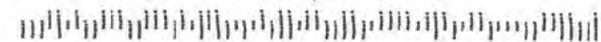
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f

MS. BRENDA SHIME
OFFICE OF AIR QUALITY PLANNING & STANDARDS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
109 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

2770930310 R777





8528 North Frontage Road
Bridgeport, IL 62417
Phone: 618-943-8700
Fax: 618-943-4501

OP-17-007-4358

P1

1-13-17

RE: Request for an extension for Facility ID 1116900
for Section 114 of the Clean Air Act reporting.

RECEIVED JAN 17 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Ms. Shine,

CDG Operations respectfully requests an extension per the reporting requirements of the ICR. While we understand the importance of having accurate information, we feel unable to meet the very short timeline dictated by the ICR. CDG Operations only recently acquired its assets in and has only controlled operations since August of 2016. As such, CDG does not have the history or resources to file accurate information by the requested date given the high number of wellbores recently acquired. We are therefore formally requesting a 60 day extension to the filing deadline. We greatly appreciate your consideration and understanding regarding this matter and look forward to your response. Please contact (b) (6) at 618-943-8700 or by email at (b) (6) @cdgops.com if you have any questions or require further detail.

Respectfully

(b) (6)

VP, Illinois Basin Operations

January 10, 2017

P1

Peter Tsirigotis
Director, Sector Policies and Programs
Division of Air Quality Planning and Standards
United States Environmental Protection Agency
Washington, D. C. 20460

RECEIVED JAN 17 2017

RE: Information Collection Request (ICR) – Extension Request

Dear Mr. Tsirigotis:

Regarding the letter dated November 14, 2016, received on December 9, 2016, Kriebel Minerals, Inc. (Kriebel) respectfully requests an extension of 60 days to complete Part 1 of the Information Collection Request. Kriebel is a family owned and operated "Conventional" (shallow gas) producer within the Commonwealth of Pennsylvania.

We have approximately (b) (4) wells/facilities that we will need to provide information on, based on our preliminary review of the Part 1 Survey. Due to several factors such as the physical and environmental challenges that impact oil and gas operations in the winter months, the Holiday season, and the demands associated with the annual reporting obligations required by the Pennsylvania Department of Environmental Protection, Kriebel is concerned that it may not be able to meet the required deadline of February 7, 2017. Kriebel understands and appreciates the value of complete and accurate data and wants to ensure that it has adequate time to collect, organize, and present the information to the Environmental Protection Agency, while meeting our existing environmental, safety and health obligations.

Please consider Kriebel's request of an extension of 60 days to complete Part 1 of the Information Collection Request.

Sincerely,

(b) (6)

Kriebel Minerals, Inc.
Production Business Manager

cc: Brenda Shine, United States Environmental Protection Agency

KRIEBEL COMPANIES

633 Mayfield Road
Clarion, Pennsylvania 16214

Developing Resources. Sharing Success.

PITTSBURGH
PA 150
10 JAN '17
PM 8 L

NEOPOST

01/10/2017

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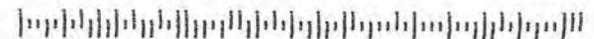


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E 143-01

Brenda Shine
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099





OAR-17-000-4352

P1+2

Caerus Oil & Gas LLC
1001 Seventeenth Street
Suite 1600
Denver, Colorado 80202

RECEIVED JAN 17 2017

December 28, 2016

Brenda Shine
Office of Air Quality Planning and Standards - U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

We recently received an Information Collection Request (ICR), EPA ICR No. 2548.01 for the parent company Caerus Oil and Gas LLC (ICR ID 2114000), as well as for the following asset subsidiaries that fall under the parent company:

- Caerus Piceance LLC (Primary Facility ID 1750000);
- Caerus Northern Rockies LLC (Primary Facility ID 1103500);
- Caerus Southern Rockies LLC (Primary Facility ID 1103600);
- Caerus WashCo LLC (Primary Facility ID 1103650); and
- Caerus Kansas LLC (Primary Facility ID 11034500)

As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 60 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Thank you for your consideration of this request. Please do not hesitate to contact me at (b) (6) if you have any questions or require any additional information.

Sincerely,

CAERUS OIL AND GAS LLC

(b) (6)

(b) (6)

Environmental Health & Safety Engineer



1001 Seventeenth Street
Suite 1600
Denver, Colorado 80202

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7015 0640 0000 9424 5304

80202
01 JAN '17
PM 01



JAN 10 2017

Brenda Shine
Office of Air Quality Planning and Standards-
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460





FCP

Four Corners Petroleum, llc

OAR-17-000-4361

PH2

RECEIVED JAN 18 2017

January 13, 2017

VIA EMAIL AND USPS

Peter Tsirigotis
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
tsirigotis.peter@epa.gov

Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
shine.brenda@epa.gov

RE: Request for Extension: November 14, 2016 Information Collection Request (ICR)
for Facility ID: 1783450

Dear Mr. Tsirigotis and Ms. Shine:

Four Corners Petroleum, LLC ("FCP") is in receipt of an Information Collection Request letter, EPA ICR No. 2548.01 for Facility ID: 1783450, from the U.S. EPA Office of Air Quality Planning and Standards dated November 14, 2016 (the "ICR"). While the ICR is dated November 14, 2016, it was not received by FCP until December 12, 2016 (see attached USPS tracking information). This letter is to request a sixty (60) day extension of FCP's deadline to respond to both Part 1 and Part 2 of the ICR survey request.

FCP requests this extension due to the fact that the ICR was not received until December 12th, and FCP's offices were not open for a portion of the months of December and January due to the national holidays. In addition, in December and January FCP staff are busy with end of year regulatory and internal reporting obligations. Further, as EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail.

This extension is necessary for FCP to fully evaluate the data requested in the ICR and to conduct the detailed reviews necessary to provide information on the requested facilities. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II (both commencing on December 12, 2016), EPA will be giving FCP much-needed time to provide accurate and complete responses to the ICR. Thank you for your consideration of this request.

Sincerely,

(b) (6)

(b) (6)

Operations Engineer

Enclosure

Four Corners Petroleum, LLC
(b) (6)
Lakewood, CO 80228

303.731.0073 (main)
720.287.3872 (fax)
www.fcpetroleum.com

RECEIVED MAIL DEVISION



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



8 05 0

November 14, 2016

Owner/Operator
FOUR CORNERS PETROLEUM LLC
390 Union Blvd Ste 630
Lakewood, CO 80228-1557

467

9214 8969 0099 9790 1735 7623 21
12 8292 5821 0626 6600 6968 4126





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Expected Delivery Day: Monday, December 12, 2016

Product & Tracking Information

Postal Product:
First-Class Mail®

Features:
Certified Mail™

DATE & TIME

STATUS OF ITEM

LOCATION

December 12, 2016 , 2:41 pm

Delivered, Left with Individual

DENVER, CO 80228

Your item was delivered to an individual at the address 4125 Jamboree Dr, Denver, CO 80228.

December 11, 2016 , 12:47 pm

Departed USPS Destination Facility

DENVER, CO 80266

December 10, 2016 , 8:17 pm

Arrived at USPS Destination Facility

DENVER, CO 80266

December 9, 2016 , 10:25 pm

Departed USPS Facility

GREENSBORO, NC 27498

December 9, 2016 , 7:26 pm

Arrived at USPS Origin Facility

GREENSBORO, NC 27498

December 9, 2016 , 6:11 pm

Accepted at USPS Origin Facility

DURHAM, NC 27709

December 7, 2016

Pre-Shipment Info Sent to USPS, USPS Awaiting Item

Available Actions

[Return Receipt Electronic](#)

[Text Updates](#)

[Email Updates](#)

Track Another Package

Tracking (or receipt) number

[Track It](#)

Manage Incoming Packages

Track all your packages from a dashboard. No tracking numbers necessary.

[Sign up for My USPS ›](#)





FCP
Four Corners Petroleum, llc

390 Union Blvd, Suite 630
Lakewood, CO 80228

DENVER
CO 802
13 JAN '17
PM 5 L



Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



0AR 17-000-4397



0142

RECEIVED JAN 19 2017

January 4, 2017

via email
and Certified Mail - Return Receipt Requested

7016 0910 0001 3019 7869

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

**RE: REQUEST FOR EXTENSION OF TIME TO RESPOND TO THE OIL AND
NATURAL GAS SECTOR ICR
FACILITY ID 1385600**

Dear Mr. Tsirigotis:

On or about December 19, 2016, the E.P.A. letter dated November 14, 2016 was delivered to the front desk reception area of our office building and left with a person not a part of our company. Unfortunately, the date of delivery was not recorded. The letter was not delivered to me until December 20, 2016. We do not know the exact date of delivery in order to calculate the due date for your ICR.

This letter will serve as a formal request for an extension of sixty (60) days to respond to the ICR., Part I and Part II.

LexGas, Inc. is a very small company owned (b) (6) LexGas, Inc. has (b) (4) to assist in the massive information collection. Like many other operators, for the past year, LexGas, Inc. has been operating (b) (4) to low commodity pricing and (b) (4) (b) (4)

The ICR will require me personally to certify the accuracy of the information provided to the E.P.A. and subjects me personally to criminal liability. Therefore, I will be required to personally travel approximately (b) (4) miles daily from our office to each site, because I cannot delegate to someone else. Your letter specifically indicates how vital it is for you to obtain the very best information; however, your restrictive deadline is the biggest impediment to receiving it. This

99 Trophy Club Drive
Trophy Club, Texas 76262
(817) 430-4162

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
January 4, 2017
Page 2

extension is absolutely necessary for me to conduct the detailed review to provide information on requested facilities.

Additionally, there are portions of the Part I Survey that I cannot understand and/or calculate. How do I determine date of delivery of E.P.A. letter? How do I determine due date of ICR? All of our gas/oil wells are produced for "sales". The questions in Section 3 and 4 are confusing and I cannot answer. Is the "Surface Site ID" asked for in Section 3 and 4 the same as the "Facility ID" provided in the November 14, 2016 letter? Please explain the calculation and reasoning for the excessive penalty (\$93,750 per day) for non-compliance. What person(s) are authorized to determine "non-compliance"? Please provide precise regulatory authority for such penalty and non-compliance authority. What appeals process is available?

We agree that the anticipated cost and burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 120 days to respond to Part I and 240 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

Please advise as to the extension request and, if possible, provide clarification and answers to the questions indicated above.

Thank you for your courtesy and cooperating in this matter.

Yours very truly,
LexGas, Inc.

(b) (6)
By _____
George S. Gafford, II, President

GSG/ghg

cc: Ms. Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460



99 Trophy Club Drive
Trophy Club, Texas 76262

X

CERTIFIED MAIL



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QUESTED

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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709
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2770980310 R777





OAR-17-000-4401

162

Jeems Bayou Production Corporation

January 11, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 19 2017

**RE: REQUEST FOR EXTENSION OF TIME TO RESPOND
TO THE OIL AND NATURAL GAS SECTOR ICR**

FACILITY ID #: 1336800

Dear Mr. Tsirigotis:

On or about December 15, 2016, we received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, we respectfully called your office to request an extension of time in which to respond to this information collection request. We spoke with Ms. Angie Carey of your office to explain our position concerning this ICR. She verbally agreed to grant an extension of 30 more days for our response. We are very appreciative of such extension but would additionally request that this extension be increased to a 60-day extension for the following reasons.

As a result of market conditions, we have trimmed our staff to only (b) (4) people who have the responsibility for collection of all information for three states in which we operate. This includes all production reporting requirements for Arkansas, Texas and Louisiana as well as accounting functions within the company, not the least of which includes joint interest billings; accounts payable and receivable; payroll reporting to three states; payroll maintenance; revenue reporting; etc.

With the new requirements from the IRS for the W2 and 1099 changes in reporting date, we have faced the unenviable task of attempting to comply with this as well. We are a small independent oil and gas operator who is diligently trying to comply with all federal and state regulations in order to continue operating; however, in the fiscal year ending September 30, 2015, as a company we lost over (b) (4) and will (b) (4). Consequently, additional burdens such as this reporting requirement make it more onerous to continue operating. (b) (4)

(b) (4)

Main Office
P.O. Box 639 Oil City, Louisiana 71061
(318) 221-4410 (318) 995-7184

Land, Geological & Engineering Office
212 Texas, Ste. 201 Shreveport, Louisiana 71101
(318) 227-2219

Mr. Peter Tsirigotis, Director

Page 2

January 11, 2017

We are currently attempting to gather all information regarding the ICR Part 1 Survey. We are unclear about the Part 2 survey and would like additional time in which to study same. We have (b) (4) (b) (4) on staff and will likely have to seek outside direction for completing Part 2. Therefore, we respectfully request an additional 60 days' time for completion of this part as well.

Sincerely,

(b) (6)

(b) (6)

/mw

CERTIFIED MAIL™



7012 1640 0001 1409 1737



Jeems Bayou Production Corporation
Main Office
P.O. Box 639
Oil City, Louisiana 71061



MR. PETER TSIRIGOTIS
DIRECTOR, SECTOR POLICIES AND PROGRAMS DIVISION
OFFICE OF AIR QUALITY PLANNING AND STANDARDS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
109 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

SHREVEPORT
LA 710
11 JAN '17
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27709-031099

